

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

BMADDOX ENTERPRISES LLC,

Plaintiff,

v.

MILAD OSKOUIE, OSKO M LTD, and  
PLATINUM AVENUE HOLDINGS PTY,  
LTD,

Defendants.

MILAD OSKOUIE and PLATINUM  
AVENUE HOLDINGS PTY, LTD,

Counterclaimants,

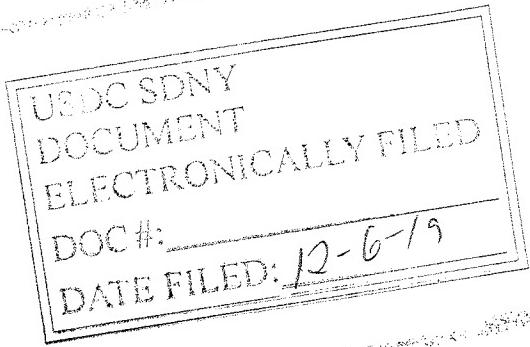
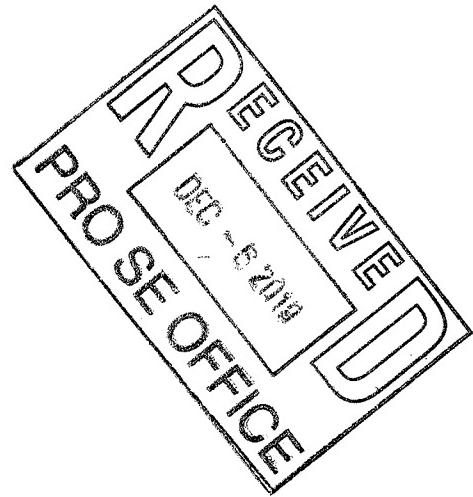
v.

BMADDOX ENTERPRISES LLC and  
BRANDON MADDOX,

Counterdefendants.

Case No. 1:17-cv-01889-RA

**DECLARATION**



- I, Miliad Oskouie, verify under penalty of perjury under the laws of the United States of America that the following is true and correct:
1. Exhibit A is a true copy of Film # 84026905 in BARCLAYS BANK DELAWARE Vs. ANDERSON J DUFF 19-00090-CO | Florida State, Pinellas County, Court. I obtained this document from the URL here <https://ccmspa.pinellascounty.org/PublicAccess/ViewDocumentFragment.aspx?Docum> entFragmentID=43901330&CheckDocumentGroups=0
  2. Exhibit B is a true copy of a filing in the above case from the process server. It was obtained at <https://ccmspa.pinellascounty.org/PublicAccess/ViewDocumentFragment.aspx?Docum> entFragmentID=43901330&CheckDocumentGroups=0
  3. Exhibit C is a true copy of Miliad Oskouie Responses to Plaintiffs Interrogatories sent to Mr Duff via email prior to the court deadline.
  4. Exhibit D is a true copy of Miliad Oskouie Responses to Plaintiffs Doc Requests via email prior to the court deadline.
  5. Exhibit E is a true copy of Osko M Responses to Plaintiffs Doc Requests via email prior to the court deadline.
  6. Exhibit F is a true copy of Osko Responses to Plaintiffs Interrogatories via email prior to the court deadline.
  7. Exhibit G is a true copy of Platinum Responses to Plaintiffs Doc Requests via email prior to the court deadline.

**Declaration**

8. Exhibit H is a true copy of Platinum Reponses to Plaintiff's Interrogatories via email prior to the court deadline

Dated: November 30, 2019



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MILAD OSKOUIE



BARCLAYS BANK DELAWARE

Plaintiff,

vs.

AFFIDAVIT IN SUPPORT OF CLAIM

ANDERSON J DUFF

Defendant(s)

STATE OF DELAWARE  
COUNTY OF NEW CASTLE

BEFORE ME, the undersigned authority, personally appeared, who after being duly sworn, deposes and says:

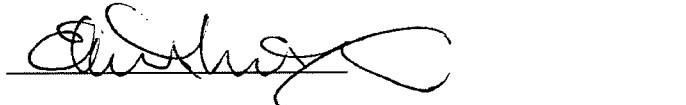
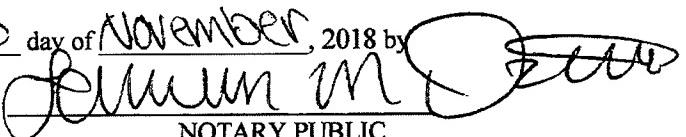
1. I, Elaine Musto, am over 18 years old and competent to make this affidavit. I am a records custodian for the Plaintiff, BARCLAYS BANK DELAWARE. I am duly authorized to make this affidavit, and because of the scope of my job responsibilities, I am familiar with the manner and method by which BARCLAYS BANK DELAWARE maintains its normal business books and records, including computer records of defaulted accounts.

2. These books and records are made in the course of regularly conducted business activity at or near the time the events they purport to describe occurred by a person with knowledge of the acts and events. The contents of this affidavit are true and correct based upon my personal knowledge of the processes by which BARCLAYS BANK DELAWARE maintains its books and records.

3. The books and records show that Defendant(s) ANDERSON J DUFF opened an account, account number [REDACTED] on 09/22/2014 and stopped making payments when due. The books and records of BARCLAYS BANK DELAWARE show that the account was charged off on 04/29/2018. The records further show that the Defendant is currently indebted to BARCLAYS BANK DELAWARE in the amount of \$7349.45. All just and lawful offsets, payments and credits have been made to the Defendant's account.

4. I declare under penalty of perjury that the foregoing is true and correct and if called as a witness I would competently testify under oath thereto.

FURTHER AFFIANT SAYETH NAUGHT.

  
Elaine Musto   
NOTARY PUBLIC

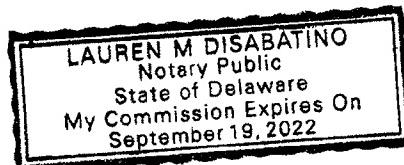
STATE OF DELAWARE  
COUNTY OF NEW CASTLE

Signed and sworn to (or affirmed) before me this 20 day of November, 2018 by

My Commission Expires: 9/19/22. (seal)

Our File #: 383903

Please understand that this is an attempt to collect a debt and any information we obtain will be used for that purpose.



Seaside, CA 93955

400 Gigling Rd.

Department of Defense - Manpower Data Center

Michael V. Sorrento, Director

Coast Guard). This status includes information on a Servicemember or his/her unit receiving notification of future orders to report for Active Duty. Upon searching the data banks of the Department of Defense Manpower Data Center based on the information that you provided, the status is the status of the individual on the active duty status date as to all branches of the Uniformed Services (Army, Navy, Marine Corps, Air Force, NOAA, Public Health, and Coast Guard). This status reflects whether the individual or higher unit has received early notification to report for active duty.

This response reflects whether the member of the unit has received early notification to Active Duty on Active Duty Status Date				
Order Notification Start Date	Order Notification End Date	Status	Service Component	
NA	NA	ND		NA

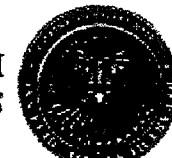
This response reflects where the individual left active duty status within 367 days preceding the Active Duty Status Date				
Active Duty Start Date	Active Duty End Date	Status	Service Component	
NA	NA	ND		NA

This response reflects the individuals' active duty status based on the Active Duty Status Date				
Active Duty Start Date	Active Duty End Date	Status	Service Component	
NA	NA	ND		NA

Certificate ID: J201LJ6PVBQLS40  
 Status As Of: Oct-19-2018  
 Middle Name: ANDERSON J  
 First Name: DUFF  
 Last Name: [REDACTED]  
 Birth Date: [REDACTED]  
 SSN: [REDACTED]

## Status Report

### Pursuant to Service members Civil Relief Act



The DoD strongly supports the enforcement of the Servicemembers Civil Relief Act (50 USC App. ? 501 et seq, as amended) (SCRA) (formerly known as the Soldiers' and Sailors' Civil Relief Act of 1940). DMDC has issued hundreds of thousands of "does not possess any information indicating that the individual is currently on active duty" responses, and has experienced only a small error rate. In the event the individual referenced above, or any family member, friend, or representative asserts in any manner that the individual was on active duty for the active duty status date, or is otherwise entitled to the protections of the SCRA, you are strongly encouraged to obtain further verification of the person's status by contacting that person's Service. Service contact information can be found on the SCRA website's FAQ page (Q33) via this URL: <https://scra.dmdc.osd.mil/faq.xhtml#Q33>. If you have evidence the person was on active duty for the active duty status date and you fail to obtain this additional Service verification, punitive provisions of the SCRA may be invoked against you. See 50 USC App. ? 521(c).

This response reflects the following information: (1) The individual's Active Duty status on the Active Duty Status Date (2) Whether the individual left Active Duty status within 367 days preceding the Active Duty Status Date (3) Whether the individual or his/her unit received early notification to report for active duty on the Active Duty Status Date.

### More information on "Active Duty Status"

Active duty status as reported in this certificate is defined in accordance with 10 USC ? 101(d) (1). Prior to 2010 only some of the active duty periods less than 30 consecutive days in length were available. In the case of a member of the National Guard, this includes service under a call to active service authorized by the President or the Secretary of Defense under 32 USC ? 502(f) for purposes of responding to a national emergency declared by the President and supported by Federal funds. All Active Guard Reserve (AGR) members must be assigned against an authorized mobilization position in the unit they support. This includes Navy Training and Administration of the Reserves (TARs), Marine Corps Active Reserve (ARs) and Coast Guard Reserve Program Administrator (RPAs). Active Duty status also applies to a Uniformed Service member who is an active duty commissioned officer of the U.S. Public Health Service or the National Oceanic and Atmospheric Administration (NOAA Commissioned Corps).

### Coverage Under the SCRA is Broader in Some Cases

Coverage under the SCRA is broader in some cases and includes some categories of persons on active duty for purposes of the SCRA who would not be reported as on Active Duty under this certificate. SCRA protections are for Title 10 and Title 14 active duty records for all the Uniformed Services periods. Title 32 periods of Active Duty are not covered by SCRA, as defined in accordance with 10 USC ? 101(d)(1).

Many times orders are amended to extend the period of active duty, which would extend SCRA protections. Persons seeking to rely on this website certification should check to make sure the orders on which SCRA protections are based have not been amended to extend the inclusive dates of service. Furthermore, some protections of the SCRA may extend to persons who have received orders to report for active duty or to be inducted, but who have not actually begun active duty or actually reported for induction. The Last Date on Active Duty entry is important because a number of protections of the SCRA extend beyond the last dates of active duty.

Those who could rely on this certificate are urged to seek qualified legal counsel to ensure that all rights guaranteed to Service members under the SCRA are protected.

**WARNING:** This certificate was provided based on a last name, SSN/date of birth, and active duty status date provided by the requester. Providing erroneous information will cause an erroneous certificate to be provided.

880600186413007349450

 Check to indicate that all information contained in this statement is true and accurate to the best of my knowledge.

Barclaycard Financial Visa® Card Statement

 Check to indicate that I have read and understood the terms and conditions of this statement.

ANDERSON J DUFF APT 1217 4310 CRESCENT ST LONG ISLAND CITY NY 11101-4248

Bardleys P.O. Box 13337 Philadelphia, PA 19101-3337

----- Manufactest Line -----

Barclays  
P.O. Box 13337  
Philadelphia, PA 19101-3337  
4310 CRESCENT ST  
APT 1217  
ANDERSON J DUFF  
LONG ISLAND CITY NY 11101-4248

Make check payable to Barclays. Allow 7-10 days for UPS delivery.  
Amount Enclosed: \$ \_\_\_\_\_

Statement Balance as of 04/21/18: (account ending **■■■■■**) \$7,349.45  
Minimum Payment Due: (includes \$1,604.93 past due amount) \$1,664.13  
Payment Due Date: 05/18/18



Ways to pay:  Barclays Mobile App  866-483-3735  Part Payment Due Date  
 BarclaysLS.com

NOTICE: SEE REVERSE SIDE OR END OF STATEMENT FOR IMPORTANT INFORMATION

SEE INSIDE: You may have additional important messages inside.

immediately to bring your account current.

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Barclaycard Financing Visa® Card Statement

ANDERSON J DUFF

| Account Ending █

| Statement Period 03/22/18-04/21/18

Page 2 of 6

**Transactions**

Transaction Date	Posting Date	Description	Amount
<b>Payments</b>			
		No Payment Received	\$0.00
<b>Total payments for this period</b>			<b>\$0.00</b>
<b>Purchase Activity for ANDERSON J DUFF card ending 8806</b>			
		No Transaction Activity at This Time	\$0.00
<b>Total purchase activity for this period</b>			<b>\$0.00</b>

► To see activity after this statement period, visit [BarclaysUS.com](http://BarclaysUS.com)

**Fees and Interest**

Transaction Date	Posting Date	Description	Amount
<b>Fees Charged</b>			
Apr 18	Apr 18	LATE PAYMENT FEE	\$37.00
<b>Total fees for this period</b>			<b>\$37.00</b>
<b>Interest Charged</b>			
Apr 21	Apr 21	Interest Charge On Purchases	\$133.65
Apr 21	Apr 21	Interest Charge On Balance Transfers	\$16.94
<b>Total interest for this period</b>			<b>\$150.59</b>

**2018 Year-to-Date Totals**

Total fees charged in 2018	\$148.00
Total interest charged in 2018	\$561.80

This Year-to-date summary reflects the Fees and Interest charged on billing statements with closing dates in 2018, and does not reflect any subsequent fee and/or interest adjustments.

**Interest Charge Calculation**

Days in Billing Cycle : 31

Type of Balance	Promotional Rate End Date	Balance Subject to Interest Rate	Annual Percentage Rate (APR)	Interest Charge
<b>Purchases</b>				
Standard Purchases	—	\$6,424.99	24.49% (v)	\$133.65
<b>Balance Transfers</b>				
Standard Balance Transfers/Checks	—	\$814.18	24.49% (v)	\$16.94

► continued on page 3

Visit BarclaysUS.com or use the Barclays Mobile App

If you have both Purchase balances with an APR greater than 0% and you also have other promotional balances on your Account, you can avoid paying interest on your Purchases by paying \$349.45 (this amount includes any Minimum Payment Due required to avoid a late fee). Please refer to the "Accrual of Interest and How to Avoid Paying Interest on Purchases" paragraph on the back of this Statement for further detail.

If you have a 0% promotional Due to avoid a late fee. If you have a 0% promotional APR on all of your Purchase balances, you can avoid paying interest on those balances during the applicable promotional period. However, pay at least your Minimum Payment Due to avoid a late fee.

#### AVOIDING INTEREST ON PURCHASES (GRACE PERIOD):

Type of Balance	Promotional Rate End Date	Balance Subject	Annual Percentage Rate (APR)	Interest Charge	Cash Advances
Standard Cash Advance		\$0.00	26.74% (V)	\$0.00	Total
<small>! Your Annual Percentage Rate (APR) is the annual interest rate on your account. (V) = Variable Rate See the "Important Information" section of this statement for more information about how we calculate interest.</small>					

ANDERSON J DUFF | Account Ending ■■■ | Statement Period 03/22/18-04/21/18 | Page 3 of 6

ANDERSON J DUFF

| Account Ending ████

| Statement Period 03/22/18-04/21/18

Page 4 of 6



03227546

## You may have noticed your statement looks a bit different

Here are some of the enhancements to your statement

- Your first page summarizes the information you need most
- Pre-scheduled or repeat payment status is clearly indicated
- The personalized Account Activity section includes page references so you can easily locate more information
- Enhanced security – only the last 4 digits of your account number are shown

Please note that your cycle date, due date and account terms remain the same.

Name	Make Changes to your contact information below			
Address				
City	State	Zip	Home Phone	Work Phone
Email Address				

Continued on page 6

**Information About Credit Bureau Reporting:** We may report information about your account to credit bureaus. Late payments, missed payments, or other defaults on your account will be reported to your account that same day.

BARCLAYS

#### **Important Information**



and do not have a grace period. See your Cardmember Agreement for more information.

**Minimum Interest Charge:** This fee, if imposed, appears in the Summary of Fees as a "Minimum Interest Charge" or "Minimum Charge."

**Credit Bureau Disputes:** If you believe that an entry we have made on your credit bureau report is inaccurate or incomplete, please contact the reporting agency directly or contact us at Card Services, P.O. Box 8803 Wilmington, DE 19899-8801. Please include your name; your account number; the credit reporting agency where you received the bureau report; a description of the error; and why you believe it is an error. We will promptly investigate, notify you of our findings, and send an update to the credit bureaus if warranted within 30 days.

#### What To Do If You Think You Find A Mistake On Your Statement

If you think there is an error on your statement, write to us at:

Card Services  
P.O. Box 8802  
Wilmington, DE 19899-8802.

In your letter, give us the following information:

- **Account information:** Your name and account number.
- **Dollar amount:** The dollar amount of the suspected error.
- **Description of problem:** If you think there is an error on your bill, describe what you believe is wrong and why you believe it is a mistake.

You must contact us within 60 days after the error appeared on your statement.

You must notify us of any potential errors *in writing*. You may call us, but if you do we are not required to investigate any potential errors and you may have to pay the amount in question.

While we investigate whether or not there has been an error, the following are true:

- We cannot try to collect the amount in question, or report you as delinquent on that amount.
- The charge in question may remain on your statement, and we may continue to charge you interest on that amount. But, if we determine that we made a mistake, you will not have to pay the amount in question or any interest or other fees related to that amount.
- While you do not have to pay the amount in question, you are responsible for the remainder of your balance.
- We can apply any unpaid amount against your credit limit.

#### Your Rights If You Are Dissatisfied With Your Credit Card Purchases

If you are dissatisfied with the goods or services that you have purchased with your credit card, and you have tried in good faith to correct the problem with the merchant, you may have the right not to pay the remaining amount due on the purchase.

To use this right, all of the following must be true:

1. The purchase must have been made in your home state or within 100 miles of your current mailing address, and the purchase price must have been more than \$50.  
(Note: Neither of these are necessary if your purchase was based on an advertisement we mailed to you, or if we own the company that sold you the goods or services.)
2. You must have used your credit card for the purchase. Purchases made with cash advances from an ATM or with a check that accesses your credit card account do not qualify.
3. You must not yet have fully paid for the purchase.

If all of the criteria above are met and you are still dissatisfied with the purchase, contact us *in writing* at:

Card Services  
P.O. Box 8802  
Wilmington, DE 19899-8802.

While we investigate, the same rules apply to the disputed amount as discussed above. After we finish our investigation, we will tell you our decision. At that point, if we think you owe an amount and you do not pay, we may report you as delinquent.

Please refer to your Cardmember Agreement for additional information about the terms of your Account.

© Barclays Bank Delaware, member FDIC



1060422 -A

## SPECIAL PROCESS SERVICE

Pinellas County, Florida  
Bob Gualtieri, Sheriff

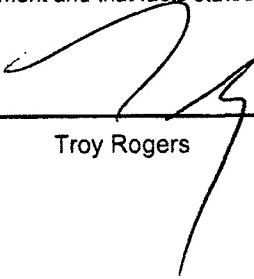
NON-SERVICE RETURN	
Court	IN THE COUNTY COURT IN AND FOR PINELLAS COUNTY, FLORIDA
Plaintiff	Case #  BARCLAYS BANK DELAWARE  19-000900-CO
Defendant	Hearing Date  ANDERSON J DUFF
Person to be Served	Came to Hand Date/Time  ANDERSON J DUFF  2/01/2019 1:07 PM
Reason Unable to Serve	Non-Service Date/Time  Other contact  02/01/2019 02/01/2019
Documents	Service Fee  Summons;Complaint;Exhibits;Civil Cover Sheet  \$49.50

After due search, careful inquiry and diligent attempts at: 9297 120TH ST, SEMINOLE, Pinellas County, FL 33772-2643. I have been unable to effect service of process upon ANDERSON J DUFF for the following reasons:

2/1/2019 1:07 PM: Per CINDY DUFF, RESIDENT, a gray-haired white female contact approx. 55-65 years of age, 5'4"-5'6" tall and weighing 140-160 lbs with glasses...stated defendant is her son and no longer resides here. Stated they lost touch and had no knowledge of his current whereabouts. Neighbor confirmed he no longer resides here.

Notary not required pursuant to F.S. 92.525(2).

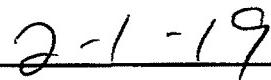
I am a citizen of the United States, over 18 years of age, not a party to nor interested in this case and I have the proper authority in the jurisdiction where I effected service, pursuant to Florida Statute Chapter 48. Under penalty of perjury, I declare that I have read the forgoing document and that facts stated herein are true and accurate.



Troy Rogers

29986

Process Server ID



Date Executed

Ref 383903



Hayt, Hayt &amp; Landau, PL

Tracking # 0032779813



\*\*\*ELECTRONICALLY FILED 01/28/2019 09:45:58 PM; KEN BURKE, CLERK OF THE CIRCUIT COURT, PINELANDS COUNTY, NJ.



Clearwater, Pinellas County, FL 33756-5165

315 Court Street

KEN BURKE CLERK CIRCUIT COURT

Continued on Reverse Side

Our File # 383903

as Deputy Clerk

BY: Julia L. Brown

Karen Burke  
As Clerk of Court

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Dated on: JAN 29 2019

To the State of Florida  
To Each Sheriff of the State: You are commanded to serve this summons and a copy of the Complaint in this lawsuit on the above named Defendant.

Drama M. Stein Bar No.: 0037902  
Drazen S. Dragutsky Bar No.: 0757551  
Domatham D. Stein Bar No.: 0070761  
Demirer Cem Meca Bar No.: 94459  
Robert J. Ovitz Bar No.: 501379  
Platinum/Platinum's Attorneys

Address: 101  
77765 S.W. 87 Avenue, Suite 101  
Law Offices of Hart, Hart & Landau, P.L.  
Miami, Florida 33173

If you choose to file a written response yourself, at the same time you file your written response to the court, you must also mail or take a copy of your written response to the Plaintiff/Plaintiff's attorney named below:

A summons has been issued against you. If you have 20 calendar days after this summons is served on you to file a written response to the attached complaint with the Clerk of the Court. A telephone call will not protect you. Your written response, including the case number given above and the names of the parties, must be filed if you want the court to hear your side of the case. If you do not file your response on time, you may lose the case, and your wages, money, and property may thereafter be taken without further warning from the court. There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may call an attorney referral service or a legal aid office (listed in the telephone book).

IMPORTEANT

SEMINOLE, FL 33772-2643

9297 120TH ST

TO: ANDERSON J DUFF

**Defendant(s)**

ANDERSON J DUKE

•SA

### **Personal Service on a Natural Person**

SUMMERS

Plaintiff,

BARCLAYS BANK DELAWARE

CASE NO.:  
PINELAS COUNTY COURT IN AND FOR

**IMPORTANTE**

Usted ha sido demandado legalmente. Tiene 20 dias, contados a partir del recibo de esta notificacion. Para contestar la demanda adjunta, por escrito, y presentarla ante este tribunal. Una llamada telefonica no lo protegera. Si usted desea que el tribunal considere su defensa, debe presentar su respuesta por escrito, incluyendo el numero del caso, y los nombres de las partes interesadas. Si usted no contesta la demanda a tiempo pudiese perder el caso y podria ser despojado de sus ingresos y propiedades, o privado de sus derechos, sin previo aviso del tribunal. Existen otros requisitos legales. Si lo desea puede usted consultar un abogado inmediatamente. Si no conoce un abogado, puede llamar a una de las oficinas de asistencia legal que aparecen en la guia telefonica.

Si desea responder a la demanda por su cuenta, al mismo tiempo en que presenta su respuesta ante el tribunal. Usted deberia enviar por correo o entregar una copia de su respuesta a la persona denominada abajo como "Plaintiff/Plaintiff's attorney" (Demandante o abogado del demandante)

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DEMANDANTE O ABOGADO

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Calle

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**IMPORTANT**

Des poursuites judiciaires ont ete entreprises contre vous. Vous avez 20 jours consecutifs a partir de la date de L'assignation de cette citation pour desposer une reponse ecrite a la plainte ci-jointe aupres de ce tribunal. Un simple coup de telephone est insuffisant pour vous proteger. Vous etes oblige de desposer votre reponse ecrite, avec mention de numero de dossier ci-dessus et du nom des parties nominees ici. Si vous souhaitez que le tribunal entende votre cause. Si vous ne deposez pas votre reponse ecrite dans le délai requis. Vous risquez de perdre la cause ainsi que votre agent, et vos biens peuvent etre saisis par la suite, sans aucun preavis ulterior pouvant requérir les services immediats d'un avocat. Si vous ne connaissez pas d'avocat, vous pouvez telephoner a un service de reference d'avocat's ou a un bureau D'assistance juridique (Figurant a L'annuaire de telephones).

Si vous choisissez de desposer vous-meme une response ecrite, il vous faudra également, en meme temps que cette formalite, faire parvenir ou expedier une copie de votre reponse ecrite au "Plaintiff/Plaintiff's Attorney" (Plaignant ou a son avocat) nomme ci-dessous.

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PLAIGNANT OU SON AVOCATE

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Rue

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

BMADDOX ENTERPRISES LLC,

Plaintiff,

v.

MILAD OSKOUIE, OSKO M LTD, and  
PLATINUM AVENUE HOLDINGS  
PTY, LTD,

Defendants.

MILAD OSKOUIE and PLATINUM  
AVENUE HOLDINGS PTY, LTD,

Counterclaimants,

v.

BMADDOX ENTERPRISES LLC and  
BRANDON MADDOX,

Counterdefendants.

Case No.: 1:17-cv-01889-RA-HBP

**DEFENDANT MILAD OSKOUIE'S  
RESPONSES AND OBJECTIONS TO  
PLAINTIFF AND COUNTERCLAIM  
DEFENDANTS' FIRST SET OF  
INTERROGATORIES TO DEFENDANT  
AND COUNTERCLAIM PLAINTIFF  
MILAD OSKOUIE**

Pursuant to Federal Rules of Civil Procedure 26 and 33 Defendant Milad Oskouie (“Defendant” or “Mr. Oskouie”) hereby responds and objects to Plaintiff and Counterclaim Defendants’ First Set of Interrogatories to Defendant Milad Oskouie (“Interrogatory(ies)”) as set forth below. Defendant’s discovery efforts are continuing and they reserve the right to amend or supplement these responses and objections as necessary.

**GENERAL QUALIFICATIONS AND OBJECTIONS**

1. Defendant objects to each interrogatory to the extent it seeks privileged attorney-client communications, protected work product, trade secrets or confidential and/or proprietary information.

9. Defendants reserve the right to supplement their responses to Plaintiff's "General Objections" and each of them are expressly incorporated by reference into each response.
8. Defendant's responses herein are expressly subject to each of the foregoing needs of the case.
7. Defendant objects to Plaintiff's interrogatories on the grounds that they do not specify a time period relevant to the issues raised in this matter, such that seek documents that are not likely to lead to the discovery of admissible evidence nor proportional to the needs of the case.
6. Defendant objects to the definition of "Defendant" to the extent it is overbroad and purports to include persons or entities that are not Defendant.
5. Defendant objects to each interrogatory to the extent that it is premature in nature.
4. Defendant objects to each interrogatory to the extent it is overbroad, vague, ambiguous, unduly burdensome, not sufficiently limited in scope, undefined and subject to different interpretations in different contexts.
3. Defendant objects to each interrogatory to the extent it purports to impose obligations beyond those required by the Federal Rules of Civil Procedure and the Local Rules of United States District Court for the Southern District of New York, as well as any orders entered in this matter.
2. Defendant objects to each interrogatory to the extent it calls for irrelevant information not reasonably calculated to lead to the discovery of admissible evidence nor proportional to the needs of the case.

Interrogatories as more information becomes known.

10. Each of the foregoing General Objections is incorporated within each of the responses set forth herein.

11. Defendant objects to Instruction No. 2 to the extent that it attempts to impose duties contrary to or inconsistent with the Federal Rules.

Subject to and without waiving such General Objections, Defendant responds as follows:

#### **INTERROGATORY NO. 1**

Identify each person who participated in, assisted with, or provided any information used in the preparation of the website appearing at <ffltrust.com>.

##### **Response No. 1:**

Defendant specifically objects to this Interrogatory on the grounds that it is overly broad unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. Defendant further objects to this Interrogatory under Local Rule 33.3(b) because request for production of documents and/or depositions are more practical methods of obtaining the information sought. In this respect, Defendant anticipates that it will produce documents that will contain the information requested to the extent that Counterdefendants requested such documents via its document requests and to the extent such documents exist in Defendant's possession, custody and control. Further, upon request and within the limits of Fed. R. Civ. P. 30 and other applicable rules and orders, Defendant will make one or more witnesses available to provide responsive deposition testimony.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant also refers Counterdefendants to Defendants' initial disclosures.

#### **INTERROGATORY NO. 2**

Identify each person who has personal knowledge concerning the subject matter of this litigation including but not limited to the allegations set forth in the Complaint and the Counterclaims.

Defendant specifically objects to this interrogatory on the grounds that it is overly broad unduly burdensome, and seeks information or documents that it is overly burdensome, and seeks information or documents that are neither relevant to any party's claim nor proportional to the needs of the case. Defendant further objects to this interrogatory under Local Rule 33.3(b) because request for production of documents and/or depositions are more practical methods of obtaining the information requested to the extent that Counterdefendants requested such documents via its document requests and to the extent such documents exist in Defendant's possession, custody and control. Further, upon request and within the limits of Fed. R. Civ. P. 30 and other applicable rules and orders, Defendant will make one or more witnesses available to provide responsive deposition testimony.

#### Response No. 3:

Identify each person who has personal knowledge concerning the management, administration, finances, financial record keeping, cash flow, or the manner in which any of Defendant's Skouie, Sko, or Platinum processed any money or benefit arising out of their respective businesses, including but not limited to <FFLtrust.com>, <InfiniteConversions.com>, and <TheUltimotutor.com> during the past four (4) years.

#### INTERROGATORY NO. 3

Subject to and without waiving the foregoing General and Specific Objectives, and subject to a stipulated confidentiality agreement and protective order, Defendant also refers Counterdefendants to Defendants' initial disclosures.

Defendant specifically objects to this interrogatory on the grounds that it is overly broad unduly burdensome, and seeks information or documents that are neither relevant to any party's claim nor proportional to the needs of the case. Defendant further objects to this interrogatory under Local Rule 33.3(b) because request for production of documents and/or depositions are more practical methods of obtaining the information requested to the extent that Counterdefendants requested such documents via its document requests and to the extent such documents exist in Defendant's possession, custody and control. Further, upon request and within the limits of Fed. R. Civ. P. 30 and other applicable rules and orders, Defendant will make one or more witnesses available to provide responsive deposition testimony.

#### Response No. 2:

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant also refers Counterdefendants to Defendants' initial disclosures.

**INTERROGATORY NO. 4**

Identify each internet service provider, cell phone provider, virtual private network service provider, electronic communication service, and remote computing service that provided any service to any Defendant concerning the operation of <FFLTrust.com>, <TheUnitutor.com>, or <InfiniteConversions.com> as well as each agreement, whether written or otherwise made, between any such service provider and any Defendant.

**Response No. 4:**

Defendant specifically objects to this s Interrogatory on the grounds that it is overly broad unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. Defendant further objects to this Interrogatory under Local Rule 33.3(b) because request for production of documents and/or depositions are more practical methods of obtaining the information sought. In this respect, Defendant anticipates that it will produce documents that will contain the information requested to the extent that Counterdefendants requested such documents via its document requests and to the extent such documents exist in Defendant's possession, custody and control. Further, upon request and within the limits of Fed. R. Civ. P. 30 and other applicable rules and orders, Defendant will make one or more witnesses available to provide responsive deposition testimony.

**INTERROGATORY NO. 5**

Identify each person who has shared a residence or living quarters with Defendant Oskouie for more than two (2) weeks during the past four (4) years.

**Response No. 5:**

Defendant specifically objects to this s Interrogatory on the grounds that it is overly broad unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. Defendant further objects to this Interrogatory under Local Rule 33.3(b) because request for production of documents and/or depositions are more practical methods of obtaining the information sought. In this respect, Defendant anticipates that it will produce documents that will contain the information requested to the extent that Counterdefendants requested such documents via its document requests and to the extent such documents exist in Defendant's possession, custody and control. Further, upon request and within the limits of Fed. R. Civ. P. 30 and

**Response No. 8:**

Identify each statement Defendant Oskouie asserts is defamatory including where and when Defendant encountered each statement.

**INTERROGATORY NO. 8**

Defendant specifically objects to this interrogatory on the grounds that it is overly broad unduly burdensome, and seeks information or documents that are neither relevant to any party's claim nor proportional to the needs of the case. Defendant also objects to this interrogatory as in violation of Local Rule 33.3(a). Defendant further objects to this interrogatory under Local Rule 33.3(b) because request for production of documents and/or depositions are more practical methods of obtaining the information sought.

**Response No. 7:**

Identify each resource upon which Defendant Oskouie or any party or third party acting in concert with him or at his direction relied upon to create the content that has appeared on <FFLTrust.com> at any point in time.

**INTERROGATORY NO. 7**

Defendant specifically objects to this interrogatory on the grounds that it is overly broad unduly burdensome, and seeks information or documents that are neither relevant to any party's claim nor proportional to the needs of the case. Defendant also objects to this interrogatory as in violation of Local Rule 33.3(a). Defendant further objects to this interrogatory under Local Rule 33.3(b) because request for production of documents and/or depositions are more practical methods of obtaining the information sought.

**Response No. 6:**

Identify each third party that has employed Defendant Oskouie, whether in a freelance, salaried, temporary, paid, or unpaid position during the past four (4) years.

**INTERROGATORY NO. 6**

Subject to and without waiving the foregoing General and Specific Objectives, and subject to a stipulated confidentiality agreement and protective order, Defendant responds as follows: none.

Other applicable rules and orders, Defendant will make one or more witnesses available to provide responsive deposition testimony.

Defendant specifically objects to this s Interrogatory on the grounds that it is overly broad unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. Defendant also objects to this Interrogatory as in violation of Local Rule 33.3(a). Defendant further objects to this Interrogatory under Local Rule 33.3(b) because request for production of documents and/or depositions are more practical methods of obtaining the information sought. In this respect, Defendant anticipates that it will produce documents that will contain the information requested to the extent that Counterdefendants requested such documents via its document requests and to the extent such documents exist in Defendant's possession, custody and control. Further, upon request and within the limits of Fed. R. Civ. P. 30 and other applicable rules and orders, Defendant will make one or more witnesses available to provide responsive deposition testimony.

#### **INTERROGATORY NO. 9**

Identify every computer, tablet, cellular phone, notebook, laptop, or other computing device that You have owned, leased, or regularly used, at work or otherwise, during the past four (4) years.

##### **Response No. 9:**

Defendant specifically objects to this s Interrogatory on the grounds that it is overly broad unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. Defendant also objects to this Interrogatory as in violation of Local Rule 33.3(a). Defendant further objects to this Interrogatory under Local Rule 33.3(b) because request for production of documents and/or depositions are more practical methods of obtaining the information sought.

#### **INTERROGATORY NO. 10**

Identify any legal claims or lawsuits filed or asserted by or against You during the past ten (10) years, including the case number, party names, and forum in which such claims or lawsuits were asserted.

##### **Response No. 10:**

Defendant specifically objects to this s Interrogatory on the grounds that it is overly broad unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. Defendant also objects to this Interrogatory as in violation of Local Rule 33.3(a). Defendant further objects to this Interrogatory under Local Rule 33.3(b) because request for production of documents and/or depositions are more practical methods of obtaining the information sought.

I identify every person or entity that has denied You employment or terminated your employment because of the allegedly defamatory statements You assert were made by Brandon Maddox or Brandon Maddox.

### INTERROGATORY NO. 13

Defendant specifically objects to this interrogatory on the grounds that it is overly broad unduly burdensome, and seeks information or documents that are neither relevant to any party's claim nor proportional to the needs of the case. Defendant also objects to this interrogatory as in violation of Local Rule 33.3(a). Defendant further objects to this interrogatory under Local Rule 33.3(b) because request for production of documents and/or depositions are more practical methods of obtaining the information sought. In this respect, Defendant anticipates that it will produce documents that will contain the information requested to the extent that Counterdefendants requested such documents via its document requests and to the extent such documents exist in Defendant's possession, custody and control. Further, upon request and within the limits of Fed. R. Civ. P. 30 and other applicable rules and orders, Defendant will make one or more witness available to provide responsive deposition testimony.

### Response No. 12:

I identify every alias, name, and online persona You have used during the past four (4) years.

### INTERROGATORY NO. 12

Defendant specifically objects to this interrogatory on the grounds that it is overly broad unduly burdensome, and seeks information or documents that are neither relevant to any party's claim nor proportional to the needs of the case. Defendant also objects to this interrogatory as in violation of Local Rule 33.3(a). Defendant further objects to this interrogatory under Local Rule 33.3(b) because request for production of documents and/or depositions are more practical methods of obtaining the information sought.

### Response No. 11:

I identify all online posts made by You or in which you have been involved concerning Brandon Maddox, Brandon Maddox, the subject matter of this litigation, or any individual or entity believed by you to be associated with Brandon Maddox or Brandon Maddox.

### INTERROGATORY NO. 11

**Response No. 13:**

Defendant specifically objects to this Interrogatory on the grounds that it is overly broad unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. Defendant also objects to this Interrogatory as in violation of Local Rule 33.3(a). Defendant further objects to this Interrogatory under Local Rule 33.3(b) because request for production of documents and/or depositions are more practical methods of obtaining the information sought.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant responds as follows: none.

**INTERROGATORY NO. 14**

Identify every person with whom You have communicated concerning BMaddox, Brandon Maddox, the subject matter of this litigation, or any individual or entity believed by You to be associated with BMaddox or Brandon Maddox.

**Response No. 14:**

Defendant specifically objects to this Interrogatory on the grounds that it is overly broad unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. Defendant further objects to this Interrogatory under Local Rule 33.3(b) because request for production of documents and/or depositions are more practical methods of obtaining the information sought. In this respect, Defendant anticipates that it will produce documents that will contain the information requested to the extent that Counterdefendants requested such documents via its document requests and to the extent such documents exist in Defendant's possession, custody and control. Further, upon request and within the limits of Fed. R. Civ. P. 30 and other applicable rules and orders, Defendant will make one or more witnesses available to provide responsive deposition testimony.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant also refers Counterdefendants to Defendants' initial disclosures.

Dated: Tehran, Iran  
October 18<sup>th</sup>, 2019

Milad Oskouie



OSKOUIE, are true and correct to the best of my knowledge, information and belief.  
INTERROGATORIES TO DEFENDANT AND COUNTERCLAIM PLAINTIFF MILAD  
PLAINTIFF AND COUNTERCLAIM DEFENDANTS, FIRST SET OF  
FORGEOMING DEFENDANT MILAD OSKOUIE'S RESPONSES AND OBJECTIONS TO  
VERIFICATION I hereby declare under penalty of perjury that the facts stated in the

Milad Oskouie



**Certificate of Service**

I hereby certify that a true and correct copy of the foregoing document:

**DEFENDANT MILAD OSKOUIE'S RESPONSES AND OBJECTIONS TO  
PLAINTIFF AND COUNTERCLAIM DEFENDANTS' FIRST SET OF  
INTERROGATORIES TO DEFENDANT AND COUNTERCLAIM PLAINTIFF  
MILAD OSKOUIE**

has been served via email on:

Anderson J. Duff, Esq.  
Revision Legal, PLLC  
244 5th Avenue, Suite 2230  
New York, NY 10001  
Phone: 212.996.4103  
E-mail: [anderson@revisionlegal.com](mailto:anderson@revisionlegal.com) and [ajd@revisionlegal.com](mailto:ajd@revisionlegal.com)

this 18th day of Octboer 2019



Milad Oskouie



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

BMADDOX ENTERPRISES LLC,

Plaintiff,

v.

MILAD OSKOUIE, OSKO M LTD, and  
PLATINUM AVENUE HOLDINGS  
PTY, LTD,

Defendants.

MILAD OSKOUIE and PLATINUM  
AVENUE HOLDINGS PTY, LTD,

Counterclaimants,

v.

BMADDOX ENTERPRISES LLC and  
BRANDON MADDOX,

Counterdefendants.

Case No.: 1:17-cv-01889-RA-HBP

**DEFENDANT MILAD OSKOUIE'S  
RESPONSES AND OBJECTIONS TO  
PLAINTIFF AND COUNTERCLAIM  
DEFENDANTS' FIRST REQUESTS FOR  
THE PRODUCTION OF DOCUMENTS  
AND THINGS TO DEFENDANT MILAD  
OSKOUIE**

Pursuant to Federal Rules of Civil Procedure 26 and 34 Defendant Milad Oskouie (“Defendant” or “Mr. Oskouie”) hereby responds and objects to Plaintiff and Counterclaim Defendants’ First Requests for the Production of Documents and Things to Defendant Milad Oskouie (“Request(s)”) as set forth below. Defendant’s discovery efforts are continuing and they reserve the right to amend or supplement these responses and objections as necessary.

**INTRODUCTION**

Counterdefendants’ Requests seek massive amounts of information with respect to overly and unnecessarily broad subject areas, and with respect to matters defined or referred to in such a vague and uncertain manner as to make meaningful responses impossible or

immunity.

attorney-client privilege, the work product doctrine, or any other applicable privilege or information. Any inadvertent disclosure of such documents shall not be a waiver of the "Product") or any other applicable privilege or immunity and will not produce such "Attorney-Client Privilege"), the work product doctrine, (hereinafter, "Attorney Work seeks documents and information protected by the attorney-client privilege (hereinafter, 1. Defendant objects to each and every request insofar as and to the extent it

## GENERAL QUALIFICATIONS AND OBJECTIONS

Countereffendants' Requests. Requests are incorporated by reference in response to each and every one of Requests. This Introductory Statement and the following General Qualifications and Qualifications and Objectives and below responses to the individual paragraphs of the Objectives and Improper for numerous additional reasons set forth in the below General Objectives and Impractical. As discovery is continuing, Defendant reserves the right to supplement its responses to these Requests. Finally, Countereffendants' Requests are sensitive, and confidential. As discovery is continuing, Defendant reserves the right to Furthermore, Countereffendants' Requests seek documents that are, at least in part, secret, Countereffendants' possession or are available from other readily accessible sources. requests. Other documents requested by Countereffendants are already in outweiged by the burden, expense and inconvenience that would be required to answer the their relevance is marginal at most and their potential value in this litigation is substantially impractical. The overwhelming majority of responses to the requested Requests that are neither relevant to any party's claim or defense nor proportional to the needs of the case, or

2. Defendant objects to each and every request to the extent it calls for the production of documents that are neither relevant to the subject matter of this Action nor reasonably calculated to lead to the discovery of admissible evidence (hereinafter, "Relevance").

3. Defendant objects to each and every request to the extent that they seek documents outside of the scope of Defendants' knowledge (hereinafter, "Outside the Scope").

4. Defendant object to each and every request the extent it is overly broad, vague and ambiguous, unduly burdensome or not reasonably calculated to lead to the discovery of admissible evidence (hereinafter, "Vague and Ambiguous" or "Overly Broad").

5. Defendant objects to each and every request to the extent it is duplicative of a request previously asked (hereinafter, "Duplicative").

6. Defendant objects to each and every request to the extent it improperly calls for a legal conclusion (hereinafter, "Legal Conclusion").

7. Defendant objects to each and every request to the extent it is premature in nature (hereinafter, "Premature").

8. Defendant objects to each and every request insofar as and to the extent it seeks divulgence of trade secrets, confidential or proprietary information of any third-party, (hereinafter, "Confidentiality"), provided, however, that such information may be disclosed subject to Defendant's other general and specific objections, and subject to protective order.

- Counteredefendants attempt to impose duties of supplementation or otherwise contrary to or that are not likely to lead to the discovery of admissible evidence.
- not specify a time period relevant to the issues raised in this matter, such that seek documents 16. Defendant objects to Counteredefendants' Requests to the extent that they do
15. Defendant objects to Counteredefendants' Requests on the grounds that they do cannot make meaningful responses to same.
- to use terms that are not defined in the Definitions contained therein, such that Defendants
14. Defendant objects to Counteredefendants' Requests to the extent they purport
13. Defendant reserves the right to redact documents in response to the Requests.
- involving or relating to the request.
- document produced pursuant to this response, or (b) any other demand for discovery
- thereof, (ii) statements made in this response to the Request of any part thereof, or (iii) any
- competence, relevance, materiality, privilege or admissibility of (i) the Request or any part
- wavier of or prejudice to Defendants' right at any later time, to raise objections to (a) the
12. Defendant is providing these responses and producing documents without
- Defendant's actual possession, custody, or control.
11. Defendant objects to each Request to the extent that it seeks documents not in obligations beyond those required by the Federal Rules.
10. Defendant objects to each Request to the extent it purports to impose
- reserves the right to supplement each of its Requests.
- Defendant is responding on the basis of its current knowledge and information. Defendant
9. Defendant objects to each and every request in its entirety on the ground that

inconsistent with the Federal Rules.

17. Defendant objects to the definitions of "Defendant," "You," and "Your" to the extent that they are overbroad and purport to include persons or entities that are not Defendant.

18. Defendant objects to Instruction Nos. 5-6 and the requested forms for producing electronically stored information. Defendant further objects to the aforesaid instructions to the extent they seek production of documents in more than one form. Defendant will produce responsive documents in the form in which they are ordinarily maintained or PDF, TIFF or Relativity production load files.

19. Defendant objects to Instruction No. 8 as vague as to the meanings of "non-identical copy" and "non-identical original." Defendant further objects to the aforesaid instruction to the extent it seeks production of documents in more than one form.

20. Defendant objects to Instruction No. 10 to the extent that it attempts to impose duties contrary to or inconsistent with the Federal Rules.

21. Defendant's responses herein are expressly subject to each of the foregoing "General Objections" and each of them are expressly incorporated by reference into each response.

22. Defendant reserves the right at any time to revise, correct, add to, or clarify the objections or responses set forth herein and the production made pursuant thereto. Each of the specific responses below are made subject to Defendant's continuing investigation, and with the understanding that Defendant may supplement the specific responses and/or the documents produced in response at some point in the future.

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of Counterdefendants, or of third parties. Defendant further specifically objects to this Request to the extent that it seeks documents protected from discovery under the attorney-client privilege, attorney work product doctrine, or any other applicable privilege or protection. Defendant further

**Response No. 2:**

All documents and communications concerning Brandon Maddox, Brandon Maddox, the subject matter of this litigation, or any individual or entity believed by You to be associated with Brandon Maddox or Brandon Maddox.

REQUEST NO. 2

Subject to and without waiving the foregoing General and Specific Objectives, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within his actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of third parties. Defendant further specifically objects to this Request to the extent that it seeks documents protected from discovery under the attorney-client privilege, attorney work product doctrine, or any other applicable privilege or protection. Defendant further specifically objects to this Request on the grounds that it is prema-  
ture, overly broad, unduly burdensome, and seeks information or documents that are neither relevant to any party's claim nor defensible nor proportional to the needs of the case. Defendant further objects to this Request on the grounds that it is duplicative of subsequent, more specific requests, and refers to the grounds that it is redundant to those documents to be produced in response to those requests.

**Response No. 1:**

All documents and communications relied upon or consulted by Defendant Oskouie in responding to B.Maddox's First Set of Interrogatories to Defendant Oskouie.

REQUEST NO. 1

: follows

Subject to and without waiving such General Objections, Defendant responds as

specifically objects to this Request on the grounds that it is premature, vague and ambiguous as to the phrase “any individual or entity believed by You to be associated with BMaddox or Brandon Maddox”, unduly burdensome, and seeks information or documents that are neither relevant to any party’s claim or defense nor proportional to the needs of the case. Defendant further objects to this Request on the grounds that it is duplicative of subsequent, more specific requests, and refer Counterdefendants to those documents to be produced in response to those requests.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within his actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

### **REQUEST NO. 3**

All documents and communications responsive to BMaddox’s First Set of Interrogatories to Defendant Oskouie.

#### **Response No. 3:**

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of Counterdefendants, or of third parties. Defendant further specifically objects to this Request to the extent that it seeks documents protected from discovery under the attorney-client privilege, attorney work product doctrine, or any other applicable privilege or protection. Defendant further specifically objects to this Request on the grounds that it is premature, overly broad, unduly burdensome, and seeks information or documents that are neither relevant to any party’s claim or defense nor proportional to the needs of the case. Defendant further objects to this Request on the grounds that it is duplicative of subsequent, more specific requests, and refer Counterdefendants to those documents to be produced in response to those requests.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within his actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

### **REQUEST NO. 4**

All documents and communications concerning Your alleged use of MILAD OSKOUIE as a trademark.

REQUEST NO. 6

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within his actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

Defendant specifically objects to this Request to the extent that it seeks documents protected from discovery under the attorney-client privilege, attorney work product doctrine, or any other applicable privilege or protection. Defendant further specifically objects to this Request on the grounds that it is overly broad and seeks information or documents that are neither relevant to any party's claim nor proportional to the needs of the case. This Request also calls for a legal conclusion, and Defendant is not obligated to provide legal analysis in its discovery responses.

**Response No. 5:**

All documents and communications concerning damage to Your reputation caused by any allegedly defamatory statement made by BMaddox or Brandon Maddox.

REQUEST NO. 5

Subject to and without waiving the foregoing General and Specific Objectives, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within his actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

Defendant specifically objects to the extent that it seeks documents protected from discovery under the attorney-client privilege, attorney work product doctrine, or any other applicable privilege or protection. Defendant further specifically objects to this request on the grounds that it is premature, overly broad, vague and ambiguous as to the phrase "as a trademark," unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. This request also calls for a legal conclusion, and Defendant is not obligated to provide legal analysis in its discovery responses. Defendant further objects to this Request on the grounds that it is duplicative of subsequent, more specific requests, and refer Counterdefendants to those documents to be produced in response to those requests.

**Response No. 4:**

All documents and communications concerning the creation, maintenance, and administration of any and every iteration of the website or other content that has appeared at <FFLTrust.com>.

**Response No. 6:**

Defendant specifically objects to this Request on the grounds that it is overly broad, unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within his actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

**REQUEST NO. 7**

All documents and communications concerning any market research conducted by or for You or at Your direction concerning educational materials in the field of federal firearms licensing under United States law.

**Response No. 7:**

Defendant specifically objects to this Request to the extent that it seeks documents protected from discovery under the attorney-client privilege, attorney work product doctrine, or any other applicable privilege or protection. Defendant further specifically objects to this Request on the grounds that it is overly broad, vague as the term "market research," ambiguous as to the meaning of "educational materials," and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within his actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

**REQUEST NO. 8**

All documents and communications concerning any application You have filed to obtain a federal firearms license in the United States, including all such resulting licenses.

**Response No. 8:**

**Response No. 10:**

All documents and communications concerning each internet service provider, virtual private network service provider, electronic communication service, and remote computing service that provided services to any Defendant concerning the operation of <FFLTrust.com>, or <InfinitiConversions.com> including any agreements, whether written or otherwise, between any such provider and any Defendant.

**REQUEST NO. 10**

Request on the grounds that it is premature, overly broad (websites other than <FFLTrust.com> are not at issue), unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. Defendant further objects to this Request on the grounds that it is duplicative of <TheUnitor.com>, or <InfinitiConversions.com> including the operation of <FFLTrust.com>, and seeks information or documentation of documents <FFLTrust.com> are not at issue, or prior, more specific requests.

Request on the grounds that it is premature, overly broad (websites other than <FFLTrust.com> are not at issue), unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. Defendant further objects to this Request on the grounds that it is duplicative of <TheUnitor.com>, or <InfinitiConversions.com> including the operation of <FFLTrust.com>, and seeks information or documentation of documents <FFLTrust.com> are not at issue, or prior, more specific requests.

Request on the grounds that it is premature, overly broad (websites other than <FFLTrust.com> are not at issue), unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. Defendant further objects to this Request on the grounds that it is duplicative of <TheUnitor.com>, or <InfinitiConversions.com> including the operation of <FFLTrust.com>, and seeks information or documentation of documents <FFLTrust.com> are not at issue, or prior, more specific requests.

**Response No. 9:**

All documents and communications concerning the management, administration, finances, financial record keeping, cash flow, or the manner in which any of Defendants Osko, or Platinum processed any money or benefit arising out of their respective businesses, including but not limited to <FFLTrust.com>, <InfinitiConversions.com>, and <TheUnitor.com>, during each of the past four (4) years, including documents sufficient to show gross sales, net profit, advertising expenditures, and online traffic to each website for each year.

**REQUEST NO. 9**

Subject to and without waiving the foregoing General and Specific Objects, and subject to a stipulated confidentiality agreement and protective order, no responsive documents exist.

Defendant specifically objects to this Request on the grounds that it is overly broad and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case.

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of third parties. Defendant further specifically objects to this Request to the extent that it seeks documents protected from discovery under the attorney-client privilege, attorney work product doctrine, or any other applicable privilege or protection. Defendant further specifically objects to this Request on the grounds that it is premature, overly broad (websites other than <FFLTrust.com> are not at issue), vague as to the meaning of “electronic communication service” and “remote computing service,” unduly burdensome, and seeks information or documents that are neither relevant to any party’s claim or defense nor proportional to the needs of the case. Defendant further objects to this Request on the grounds that it is duplicative of subsequent or prior, more specific requests.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within his actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

#### **REQUEST NO. 11**

Documents and communications sufficient to show every address at which You have resided for at least one (1) month or claimed as Your primary residence during the past four (4) years.

#### **Response No. 11:**

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of third parties. Defendant further specifically objects to this Request to the extent that it seeks documents protected from discovery under the attorney-client privilege, attorney work product doctrine, or any other applicable privilege or protection. Defendant further specifically objects to this Request on the grounds that it is grossly overly broad, vague as to the meaning of “resided” and “primary residence,” unduly burdensome, and seeks information or documents that are neither relevant to any party’s claim or defense nor proportional to the needs of the case.

#### **REQUEST NO. 12**

All documents and communications concerning any negative feedback obtained from any third party that has employed You in any capacity, including in a freelance, salaried, temporary, paid, or unpaid position during the past four (4) years.

#### **Response No. 12:**

Documents and communications sufficient to identify every account You currently have or have had access to during the past four (4) years at any bank or other financial service provider, including any account that You share, draw from, or otherwise have access to but do not control.

#### REQUEST NO. 14

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement, custodian of current will produce any non-privileged documents within his actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

Counterdefendants to those documents to be produced in response to those requests. Request on the grounds that it is duplicative of subsequent, more specific requests, and refer claim or defense nor proportionate to the needs of the case. Defendant further objects to this burdensome, and seeks information or documents that it is premature, overly broad, unduly specifically objects to this Request on the grounds that it is neither relevant to any party's product doctrine, or any other applicable privilege. Defendant further documents protected from discovery under the attorney-client privilege, attorney work third parties. Defendant further specifically objects to this Request to the extent that it seeks documentation of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the custody of another party. Defendant further objects to this documentation of documents that are not in the actual possession, custody, or control of Defendant specifically objects to this Request on the grounds that it seeks the product doctrine further specifies to the meaning of "negligent

#### Response No. 13:

All documents and communications concerning any damages You claim to have suffered as a result of actions taken by BMaddox or Brandon Maddox.

#### REQUEST NO. 13

Request on the grounds that it is grossly broad, vague as to the meaning of "negligent feedingback," ambiguous as to the meaning of "employed" in that the Request seeks information concerning "unpaid position(s)," unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case.

Defendant, but rather are in the possession, custody, and control of third parties. Defendant further objects to this Request to the extent that it seeks the product doctrine further specifies to the meaning of "negligent

**Response No. 14:**

Defendant specifically objects to this Request on the grounds that it is wholly overly broad, unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case.

**REQUEST NO. 15**

Documents and communications sufficient to show every criminal citation You have received in any jurisdiction during Your lifetime to date.

**Response No. 15:**

Defendant specifically objects to this Request on the grounds that it is wholly overly broad, vague as to the meaning of "criminal citation," and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, no responsive documents exist.

**REQUEST NO. 16**

Documents and communications sufficient to show every civil citation You have received in any jurisdiction during Your lifetime to date.

**Response No. 16:**

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of Counterdefendants. Defendant further specifically objects to this Request on the grounds that it is wholly overly broad, vague as to the meaning of "civil citation," and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case.

**REQUEST NO. 17**

All documents and communications concerning any legal claims or lawsuits filed by or against You during the past ten (10) years.

Response No. 19:

All documents and communications concerning any alias, name, or alternate person You have used during the past four (4) years.

REQUEST NO. 19

Subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within his actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

Request also calls for a legal conclusion, and Defendant is not obligated to provide legal analysis in its discovery responses. Defendants further object to this Request on the grounds that it is duplicative of Request No. 4, and refers Counterdefendants to those documents to be produced in response to that Request.

Relevant to any party's claim or defense nor proportionate to the needs of the case. This request on the grounds that it is overly broad, vague and ambiguous as to the phrase "as a trademark," unduly burdensome, and seeks information or documents that are neither relevant to any attorney-client privilege or protection. Defendant further specifically objects to this request from discovery under the attorney-client privilege, attorney work product doctrine, or any other applicable privilege or protection. Defendant further specifies "as a trademark" whether such account was owned by You or otherwise.

Defendant specifically objects to this Request to the extent that it seeks documents protected from discovery under the attorney-client privilege, attorney work product doctrine, or any other applicable privilege or protection. Defendant further specifies "as a trademark" whether such account was owned by You or otherwise.

Response No. 18:

All documents and communications concerning every social media account You have, during the past four (4) years, used in connection with <FFLTrust.com>, <TheUnitutor.com>, <infinityconversations.com>, or any marketing You assert uses MILLAD OSKOUIE as a trademark whether such account was owned by You or otherwise.

REQUEST NO. 18

Defendant further object to this Request on the grounds that it is duplicative of Requests Nos. 15-16. Defendant further objects to this Request on the grounds that it is duplicative of Requests Nos. 15-16. Defendant further objects to this Request on the grounds that it is wholly overbroad, vague as to the meaning of "legal claims," and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. Defendant further specifies to this Request on the grounds that it is wholly overbroad, vague as to the meaning of "legal claims," and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. Defendant, but rather are in the possession, custody, and control of Counterdefendants. Production of documents that are not in the actual possession, custody, or control of Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Counterdefendants.

Response No. 17:

Defendant specifically objects to this Request to the extent that it seeks documents protected from discovery under the attorney-client privilege, attorney work product doctrine, or any other applicable privilege or protection. Defendant further specifically objects to this Request on the grounds that it is overly broad, vague and ambiguous as to the phrase "alternate persona," ambiguous as to the meaning of "have used" in the context of this Request, unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. Defendants further object to this Request on the grounds that it is duplicative of subsequent and prior requests.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within his actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

#### **REQUEST NO. 20**

All materials upon which You or anyone working with or for You relied to create any content that did or was intended to appear at <FFLTrust.com>.

#### **Response No. 20:**

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of Counterdefendants, or of third parties, including but not limited to the Bureau of Alcohol, Tobacco, Firearms and Explosives. Defendant further specifically objects to this Request on the grounds that it is overly broad, unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. Defendant further objects to this Request on the grounds that it is duplicative of subsequent, more specific requests, and refer Counterdefendants to those documents to be produced in response to those requests.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within his actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

#### **REQUEST NO. 21**

All documents and communications concerning every edition of every educational product sold, distributed, or displayed by or at <FFLTrust.com>.

proportional to the needs of the case. Defendant further objects to this Request to the extent it information or documents that are neither relevant to any party's claim or defense nor of "in rapid succession" in the context of this Request, unduly burdensome, and seeks service provider," ambiguous as to the meaning of "opt-in," ambiguous as to the meaning the grounds that it is wholly overly broad, vague and ambiguous as to the phrase "online applicable privilege or protection. Defendant further specifically objects to this Request on discoverability under the attorney-client privilege, attorney work product doctrine, or any other specificially objects to this Request to the extent that it seeks documents protected from Defendant, but rather are in the possession, custody, and control of third parties. Defendant production of documents that are not in the actual possession, custody, or control of Defendant specifically objects to this Request on the grounds that it seeks the

#### Response No. 22:

All documents and communications You have sent or have caused to be sent out from any email account or online service provider to multiple third-parties at once or in rapid succession concerning federal firearms licensing in the United States, including documents and communications sufficient to identify each recipient of any such newsletter, list serve, or email blast and describe how recipients were able to opt-into receiving such communications or otherwise became desiganted as a recipient of the same.

#### REQUEST NO. 22

Subject to and without waiving the foregoing General and Specific Objects, and any non-privileged documents within his actual possession, custody or control that can be subject to a stipulated confidentiality agreement or order, Defendant will produce located after a reasonable and diligent search that are responsive to this Request.

The grounds that it is overly broad, vague and ambiguous as to the phrase "educational product," ambiguous as to the meaning of "edition," ambiguous as to the meaning of "by or at" in the context of this Request, unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. Defendant further objects to this Request on the grounds that it is duplicative of subsequent and prior requests.

Discovery under the attorney-client privilege, attorney work product doctrine, or any other specificially objects to this Request to the extent that it seeks documents protected from Defendant, but rather are in the possession, custody, and control of third parties. Defendant production of documents that are not in the actual possession, custody, or control of Defendant specifically objects to this Request on the grounds that it seeks the

#### Response No. 21:

directs Defendant to “describe” anything. Defendant further objects to this Request on the grounds that it is duplicative of subsequent and prior requests.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within his actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

#### **REQUEST NO. 23**

All documents and communications concerning Your allegation that BMaddox or Brandon Maddox made any statement concerning You with malice or the intent to cause harm to Your business and reputation.

##### **Response No. 23:**

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of Counterdefendants. This Request also calls for a legal conclusion, and Defendant is not obligated to provide legal analysis in its discovery responses.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within his actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

#### **REQUEST NO. 24**

Documents sufficient to show the nature and quality of Defendant Platinum’s services.

##### **Response No. 24:**

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of other Defendants. Defendant further specifically objects to this Request on the grounds that it is wholly overly broad, vague as to the meaning of “quality,” unduly burdensome, and seeks information or documents that are neither relevant to any party’s claim or defense nor proportional to the needs of the case.

#### **REQUEST NO. 25**

**Response No. 27:**

All documents and communications concerning any damages You claim to have suffered in this action.

REQUEST NO. 27

Subject to and without waiving the foregoing General and Specific Objectives, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce many non-privileged documents within his actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of third parties. Defendant specifically objects to this Request of other Defendants or of third parties, but rather are in the possession, custody, and control of other Defendants, or of other attorneys-client privilege, attorney work product doctrine, or any other applicable privilege or protection. Defendant further seeks to the measure of "employed" in the context of this Request, unduly burdensome, and seeks information or documentation that are neither relevant to any party's claim or defense nor proportional to the needs of the case. Defendant further objects to this Request on the grounds that it is duplicative of subsequent and prior requests.

**Response No. 26:**

All documents and communications concerning every third party employed by You, Defendant Osko, or Defendant Platinum in connection with FFLTrust.com».

REQUEST NO. 26

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of third parties. Defendant further specifically objects to this Request on the grounds that it is wholly overbroad, vague as to the meaning of the phrase "concerning Your knowledge," unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case.

Response No. 25:

All documents and communications concerning Your knowledge of <RocketFFL.com>.

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of Counterdefendants. Defendant further objects to this Request on the grounds that it is premature, overly broad, unduly burdensome, seeks confidential or proprietary information.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within his actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

#### **REQUEST NO. 28**

All documents and communications concerning Defendant Osko's role in the creation, maintenance, administration, or management of <FFLTrust.com>.

##### **Response No. 28:**

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of other Defendants or of third parties. Defendant specifically objects to this Request to the extent that it seeks documents protected from discovery under the attorney-client privilege, attorney work product doctrine, or any other applicable privilege or protection. Defendant further specifically objects to this Request on the grounds that it is wholly overly broad, ambiguous as to the meaning of "role" in the context of this Request, unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. Defendant further objects to this Request on the grounds that it is duplicative of subsequent and prior requests.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within his actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

#### **REQUEST NO. 29**

All documents and communications concerning the creation, acquisition, or inclusion of any federal firearms license that appears or has appeared in any materials sold, distributed, or displayed by or at <FFLTrust.com>.

##### **Response No. 29:**

Defendant further objects to this Request on the grounds that it is premature, overly broad, Defendant, but rather are in the possession, custody, and control of Counterdefendants. Production of documents that are not in the actual possession, custody, or control of Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the possession, custody, and control of Counterdefendants.

**Response No. 31:**

All documents and communications concerning Rabiu Islam as referenced in Your Counterclaims.

**REQUEST NO. 31**

Defendant further objects to this Request on the grounds that it is wholly overly broad, vague as to the meaning of "nature," unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. Defendant, but rather are in the possession, custody, and control of other Defendants. Production of documents that are not in the actual possession, custody, or control of Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of other Defendants.

**Response No. 30:**

Documents and communications sufficient to show the nature of Defendant Osko's business.

**REQUEST NO. 30**

Subject to and without waiving the foregoing General and Specific Objects, and subject to a stipulated confidentiality agreement or protective order, Defendant will produce any non-privileged documents within his actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

The grounds that it is wholly overly broad, vague and ambiguous as to the phrase "the creation, acquisition, or inclusion of" in the context of this Request, unduly burdensome, and seeks information, or disclosure of, in the attorney-client privilege, attorney work product doctrine, or any other applicable privilege or protection. Defendant further objects to this Request on the grounds that it is wholly overly broad, vague and ambiguous as to the phrase "the creation, acquisition, or inclusion of" in the context of this Request, unduly burdensome, and seeks disclosure under the attorney-client privilege, attorney work product doctrine, or any other applicable privilege or protection. Defendant further objects to this Request to the extent that it seeks documents protected from specific discovery under the attorney-client privilege, attorney work product doctrine, or any other applicable privilege or protection. Defendant objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, and control of third parties. Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of

and unduly burdensome.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within his actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

**REQUEST NO. 32**

All documents and communications concerning Alexey Bubily as referenced in Your Counterclaims.

**Response No. 32:**

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of Counterdefendants. Defendant further objects to this Request on the grounds that it is premature, overly broad, and unduly burdensome.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within his actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

**REQUEST NO. 33**

All documents and communications concerning every use of or participation in the DMCA's notice and takedown procedure by any party to this lawsuit.

**Response No. 33:**

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of Counterdefendants or of third parties. Defendant further specifically objects to this Request on the grounds that it is wholly overly broad, vague as to the meaning of the phrase "use of or participation in," unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce

Subject to and without waiving the foregoing General and Specific Objectives, and  
any non-privileged documents within his actual possession, custody or control that can be  
subject to a stipulated confidentiality agreement and protective order, Defendant will produce

Defendant specifically objects to this Request on the grounds that it seeks the  
production of documents that are not in the actual possession, custody, or control of  
Defendant, but rather are in the possession, custody, or control of Counterdefendants or of  
third parties. Defendant further specifically objects to this Request on the grounds that it is  
wholly overly broad, unduly burdensome, and seeks information or documents that are  
neither relevant to any party's claim or defense nor proportional to the needs of the case.

All documents and communications concerning any communication with Your parents about  
the subject matter of this case, BMaddox, Brandon Maddox, or any communications they  
have received from any other person concerning the same.

Request No. 35:

Subject to and without waiving the foregoing General and Specific Objectives, and  
any non-privileged documents within his actual possession, custody or control that can be  
subject to a stipulated confidentiality agreement and protective order, Defendant will produce  
Defendant specifically objects to this Request on the grounds that it seeks the  
production of documents that are not in the actual possession, custody, or control of  
third parties. Defendant further specifically objects to this Request on the grounds that it is  
wholly overly broad, vague and ambiguous as to the meaning of the phrase "physical  
violence," unduly burdensome, and seeks information or documents that are neither relevant  
located after a reasonable and diligent search that are responsive to this Request.

All documents and communications concerning any statement made by BMaddox or Brandon  
Maddox that you assert threatened You, Your family, or any of Your associates with physical  
violence.

Request No. 34:

Subject to and without waiving the foregoing General and Specific Objectives, and  
any non-privileged documents within his actual possession, custody or control that can be  
located after a reasonable and diligent search that are responsive to this Request.

All documents and communications concerning any statement made by BMaddox or Brandon  
Maddox that you assert threatened You, Your family, or any of Your associates with physical  
violence.

REQUEST NO. 34

any non-privileged documents within his actual possession, custody or control that can be  
located after a reasonable and diligent search that are responsive to this Request.

located after a reasonable and diligent search that are responsive to this Request.

**REQUEST NO. 36**

Documents and communications sufficient to identify every domain that You own, control, manage, or administer.

**Response No. 36:**

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of third parties. Defendant further specifically objects to this Request on the grounds that it is wholly overly broad (other domains are not at issue in this case), unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. Defendant further objects to this Request on the grounds that it is duplicative of subsequent and prior requests.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within his actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

**REQUEST NO. 37**

Documents and communications sufficient to identify every legal position You have held in any capacity, describe Your duties in such positions, and identify when and for how long you held each position.

**Response No. 37:**

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of third parties. Defendant further specifically objects to this Request on the grounds that it is wholly overly broad, vague as to the meaning of "legal position," unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. Defendant further objects to this Request to the extent it directs Defendant to "describe" or "identify" anything.

**REQUEST NO. 38**

**REQUEST NO. 41**

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of third parties. Defendant further specifically objects to this Request on the grounds that it is wholly overly broad, vague as to the meaning of "describe" in the context of this Request, unduly burdensome, and seeks information or documentation that are neither relevant to any party's claim or defense nor proportional to the needs of the case.

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of third parties. Defendant further specifically objects to this Request on the grounds that it is wholly overly broad, vague as to the meaning of "describe" in the context of this Request, unduly burdensome, and seeks information or documentation that are neither relevant to any party's claim or defense nor proportional to the needs of the case.

**Response No. 40:**

Documents and communications sufficient to identify every article or other piece You have written and published during the past four (4) years.

**REQUEST NO. 40**

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of third parties. Defendant further specifically objects to this Request on the grounds that it is wholly overly broad, vague as to the meaning of "describe" in the context of this Request, unduly burdensome, and seeks information or documentation that are neither relevant to any party's claim or defense nor proportional to the needs of the case.

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of third parties. Defendant further specifically objects to this Request on the grounds that it is wholly overly broad, vague as to the meaning of "describe" in the context of this Request, unduly burdensome, and seeks information or documentation that are neither relevant to any party's claim or defense nor proportional to the needs of the case.

**Response No. 39:**

Documents and communications sufficient to describe Your citizenship status.

**REQUEST NO. 39**

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of third parties. Defendant further specifically objects to this Request on the grounds that it is wholly overly broad, vague as to the meaning of "describe" in the context of this Request, unduly burdensome, and seeks information or documentation that are neither relevant to any party's claim or defense nor proportional to the needs of the case.

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of third parties. Defendant further specifically objects to this Request on the grounds that it is wholly overly broad, vague as to the meaning of "describe" in the context of this Request, unduly burdensome, and seeks information or documentation that are neither relevant to any party's claim or defense nor proportional to the needs of the case.

**Response No. 38:**

All documents and communications on which You rely to assert that You cannot attend a settlement hearing in the United States.

All documents and communications upon which You intend to rely to support Your assertion that BMaddox or Brandon Maddox obtained private information about You using surreptitious or unlawful means.

**Response No. 41:**

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of Counterdefendants or of third parties. Defendant further specifically objects to this Request on the grounds that it is wholly overly broad, vague and ambiguous as to the meaning of the phrase "using surreptitious or unlawful means," unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within his actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

**REQUEST NO. 42**

All documents and communications upon which You intend to rely to support Your assertion that BMaddox and Brandon Maddox have a history of employing third parties' to "do their hacking bidding for them . . . ."

**Response No. 42:**

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of Counterdefendants or of third parties. Defendant further specifically objects to this Request on the grounds that it is wholly overly broad, vague and ambiguous as to the meaning of the phrase "employing third parties'," unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within his actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

**REQUEST NO. 43**

located after a reasonable and diligent search that are responsive to this Request.  
any non-privileged documents within his actual possession, custody or control that can be  
subject to a stipulated confidentiality agreement and protective order, Defendant will produce  
Subject to and without waiving the foregoing General and Specific Objects, and

analyses in its discovery responses.  
Request also calls for a legal conclusion, and Defendant is not obligated to provide legal  
neither relevant to any party's claim or defense nor proportional to the needs of the case. This  
wholly overly broad, unduly burdensome, and seeks information or documents that are  
third parties. Defendant further specifically objects to this Request on the grounds that it is  
Defendant, but rather are in the actual possession, custody, and control of Counterdefendants or of  
producton of documents that are not in the actual possession, custody, or control of  
Defendant specifically objects to this Request on the grounds that it seeks the

**Response No. 44:**

All documents and communications upon which You intend to rely to support Your assertion  
that any statement made by BMaddox or Brandon Maddox was likely to deceive consumers  
as to Defendant Platinum's services.

**REQUEST NO. 44**

located after a reasonable and diligent search that are responsive to this Request.  
any non-privileged documents within his actual possession, custody or control that can be  
subject to a stipulated confidentiality agreement and protective order, Defendant will produce  
Subject to and without waiving the foregoing General and Specific Objects, and

analyses in its discovery responses.  
Request also calls for a legal conclusion, and Defendant is not obligated to provide legal  
neither relevant to any party's claim or defense nor proportional to the needs of the case. This  
wholly overly broad, vague and ambiguous as to the meaning of the phrase "bad faith,  
specific intent to profit," unduly burdensome, and seeks information or documents that are  
Defendant, but rather are in the actual possession, custody, and control of Counterdefendants or of  
producton of documents that are not in the actual possession, custody, or control of  
Defendant specifically objects to this Request on the grounds that it seeks the

**Response No. 43:**

All documents and communications upon which You intend to rely to support Your assertion  
that BMaddox or Brandon Maddox registered <MiladOskouie.com> with a bad faith, specific  
intent to profit from said registration.

**REQUEST NO. 45**

All documents and communications upon which You intend to rely to support Your assertion that Defendant Platinum's reputation has been irreparably harmed.

**Response No. 45:**

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of Counterdefendants or of third parties. Defendant further specifically objects to this Request on the grounds that it is wholly overly broad, unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. This Request also calls for a legal conclusion, and Defendant is not obligated to provide legal analysis in its discovery responses.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within his actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

**REQUEST NO. 46**

All documents and communications upon which You intend to rely to support Your assertion that BMaddox or Brandon Maddox engaged in a pattern of unfair competition.

**Response No. 46:**

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of Counterdefendants or of third parties. Defendant further specifically objects to this Request on the grounds that it is wholly overly broad, unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. This Request also calls for a legal conclusion, and Defendant is not obligated to provide legal analysis in its discovery responses.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within his actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

Subject to a stipulated confidentiality agreement and protective order, Defendant will produce subject to and without waiving the foregoing General and Specific Objects, and

Defendant further specifies to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, or control of Counterdefendants or of third parties. Defendant further specifically objects to this Request on the grounds that it is prematute, wholly overly broad, and seeks information or documents that are neither relevant to any party's claim nor proportional to the needs of the case. This Request also calls for a legal conclusion, and Defendant is not obligated to provide legal analysis in its discovery responses.

**Response No. 48:**

All documents and communications upon which You intend to rely to support Your assertion that either Brandon Maddox or Brandon Maddox knew of any claimed contracts You or Defendant Platinum had entered into with third parties.

**REQUEST NO. 48**

Defendant further specifies to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Counterdefendants or of third parties. Defendant further specifies to this Request on the grounds that it is wholly overbroad and seeks information or documents that are neither relevant to any party's claim nor proportional to the needs of the case. This Request also calls for a legal conclusion, and Defendant is not obligated to provide legal analysis in its discovery responses.

Defendant further specifies to this Request on the grounds that it seeks documents protected from discovery under the attorney-client privilege, attorney work product doctrine, or any other applicable privilege or protection. Defendant further specifies to this Request on the grounds that it is wholly overbroad, and seeks information or documents that are neither relevant to any party's claim nor proportional to the needs of the case. This Request also calls for a legal conclusion, and Defendant is not obligated to provide legal analysis in its discovery responses.

**Response No. 47:**

All documents and communications upon which You intend to rely to support Your assertion that You are entitled to punitive damages under any claim You have asserted.

**REQUEST NO. 47**

any non-privileged documents within his actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

**REQUEST NO. 49**

All contracts or agreements between You or Defendant Platinum and Your or Defendant Platinum's hosting providers during the past four (4) years.

**Response No. 49:**

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of third parties. Defendant further specifically objects to this Request to the extent that it seeks documents protected from discovery under the attorney-client privilege, attorney work product doctrine, or any other applicable privilege or protection. Defendant further specifically objects to this Request on the grounds that it is premature, overly broad (websites other than <FFLTrust.com> are not at issue), vague as to the meaning of "hosting providers," unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. Defendant further objects to this Request on the grounds that it is duplicative of Request No. 10.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within his actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

**REQUEST NO. 50**

All documents and communications upon which You intend to rely to support Your assertion that BMaddox or Brandon Maddox intentionally and improperly interfered with any contracts between You or Defendant Platinum and any third party intending to damage Your or Defendant Platinum's business.

**Response No. 50:**

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of Counterdefendants or of third parties. Defendant further specifically objects to this Request on the grounds that it is wholly overly broad, vague and ambiguous as to the meaning of the phrase "intending to damage," unduly burdensome, and seeks information or documents that are neither relevant

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of third parties. Defendant further specifically objects to this Request on the grounds that it is wholly overbroad (other websites are not at issue), vague and ambiguous as to the meaning of the phrase "any other websites are not at issue", and ambiguous as to the grounds that it is wholly overbroad claim You or any other Defendant has made to own any rights protected by copyright,"

**Response No. 52:**

All documents and communications concerning any claim You or any other Defendant has made to own any rights protected by copyright in connection with <imfinitconversations.com>, <TheUnitutor.com>, <FFLTrust.com>, or any other content during the past four (4) years.

**REQUEST NO. 52**

Defendant specifically objects to this Request on the grounds that it is overly broad, vague as to the meaning of "regularly used," unduly burdensome, and seeks information or documents that are neither relevant to any party's claim nor defense nor proportional to the needs of the case.

Defendant further specifically objects to this Request on the grounds that it is overly broad, attorney work product doctrine, or any other applicable privilege or protection. Defendant further specifically objects to this Request on the grounds that it is overly broad, attorney work product doctrine, or any other privilege under the attorney-client privilege, attorney work products protected from discovery to the extent that it seeks documents produced further specifically objects to this Request to the extent that it seeks documents produced Defendant, but rather are in the possession, custody, and control of third parties. Defendant production of documents that are not in the actual possession, custody, or control of Defendant specifically objects to this Request on the grounds that it seeks the other applicable privilege or protection. Defendant further specifically objects to this Request on the grounds that it is overly broad, attorney work product doctrine, or any other privilege under the attorney-client privilege, attorney work products protected from discovery to the extent that it seeks documents produced further specifically objects to this Request to the extent that it seeks documents produced Defendant's claim or defense nor proportional to the needs of the case.

**Response No. 51:**

Documents and things sufficient to identify every computer, tablet, cellular phone, notebook, laptop, or other computing device that You have owned, leased, or regularly used, at work or otherwise, during the past four (4) years.

**REQUEST NO. 51**

Subject to and without waiving the foregoing General and Specific Objects, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within his actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

Subject to and without waiving the foregoing General and Specific Objects, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within his actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

Discovery responses.

to any party's claim or defense nor proportional to the needs of the case. This Request also calls for a legal conclusion, and Defendant is not obligated to provide legal analysis in its discovery responses.

unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. This Request also calls for a legal conclusion, and Defendant is not obligated to provide legal analysis in its discovery responses.

#### **REQUEST NO. 53**

All documents and communications upon which You intend to rely to support Your assertion that BMaddox has unlawfully monopolized in the "FFL guide market" or the "online FFL guide submarket."

##### **Response No. 53:**

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of Counterdefendants or of third parties. Defendant further specifically objects to this Request on the grounds that it is premature, wholly overly broad, vague and ambiguous as to the meaning of the phrase "unlawfully monopolized," unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. This Request also calls for a legal conclusion, and Defendant is not obligated to provide legal analysis in its discovery responses.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within his actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

#### **REQUEST NO. 54**

All documents and communications upon which You intend to rely to support Your assertion that BMaddox or Brandon Maddox registered <MiladOskouie.com> with a bad faith, specific intent to profit from said registration.

##### **Response No. 54:**

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of Counterdefendants or of third parties. Defendant further specifically objects to this Request on the grounds that it is premature, wholly overly broad, vague and ambiguous as to the meaning of the phrase "suppressed competition," unduly burdensome, and seeks information or documents that are

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Plaintiff that any of BMaddox's or Brandon Maddox's alleged actions concerning the subject matter of this lawsuit were "extreme and outrageous."

**Response No. 56:**

All documents and communications upon which You intend to rely to support Your allegation to a stipulated confidentiality agreement, custody or control that can be located after a reasonable and diligent search that are responsive to this Request. Subject to and without waiving the foregoing General and Specific Objectives, and any non-privileged documents within his actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

**REQUEST NO. 56**

Subject to and without waiving the foregoing General and Specific Objectives, and neither relevant to any party's claim or defense nor proportional to the needs of the case. This Request also calls for a legal conclusion, and Defendant is not obligated to provide legal analysis in its discovery responses.

Defendant, but rather are in the possession, custody, or control of Counterdefendants or of third parties. Defendant further specifically objects to this Request on the grounds that it is premature, overly broad, unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. This Request also calls for a legal conclusion, and Defendant is not obligated to provide legal analysis in its discovery responses.

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Plaintiff.

**Response No. 55:**

All documents and communications upon which You intend to rely to support Your claim that BMaddox or Brandon Maddox intentionally interfered with any property or chattel owned by Defendant Platinum and that any such alleged interference damaged Defendant Platinum.

**REQUEST NO. 55**

Subject to and without waiving the foregoing General and Specific Objectives, and neither relevant to any party's claim or defense nor proportional to the needs of the case. This Request also calls for a legal conclusion, and Defendant is not obligated to provide legal analysis in its discovery responses.

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Plaintiff that any non-privileged documents within his actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Plaintiff that any of BMaddox's or Brandon Maddox's alleged actions concerning the subject matter of this lawsuit were "extreme and outrageous."

Defendant, but rather are in the possession, custody, and control of Counterdefendants or of third parties. Defendant further specifically objects to this Request on the grounds that it is premature, overly broad, unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. This Request also calls for a legal conclusion, and Defendant is not obligated to provide legal analysis in its discovery responses.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within his actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

#### **REQUEST NO. 57**

All documents and communications upon which You intend to rely to support Your assertion that You have "experienced extreme emotional distress" as a result of BMaddox's or Brandon Maddox's allegedly wrongful acts.

#### **Response No. 57:**

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of Counterdefendants or of third parties. Defendant further specifically objects to this Request on the grounds that it is premature, overly broad, unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. This Request also calls for a legal conclusion, and Defendant is not obligated to provide legal analysis in its discovery responses.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within his actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

#### **REQUEST NO. 58**

All documents and communications upon which You intend to rely to support Your allegation that any of BMaddox's or Brandon Maddox's alleged actions concerning the subject matter of this lawsuit constituted "an unreasonable, unwarranted, serious and offensive intrusion upon" Your seclusion.

#### **Response No. 58:**

**Response No. 60:**

All documents and communications upon which You intend to rely to support Your assertion that You are entitled to an award of attorneys' fees under any claim You have asserted.

**REQUEST NO. 60**

Subject to and without waiving the foregoing General and Specific Objectives, and subject to a stipulated confidentiality agreement effective order, Defendant will produce any non-privileged documents within his actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

Request also calls for a legal conclusion, and Defendant is not obligated to provide legal neither relevant to any party's claim or defense nor proportional to the needs of the case. This premature, overly broad, unduly burdensome, and seeks information or documents that are third parties. Defendant further specifically objects to this Request on the grounds that it is Defendant, but rather are in the possession, custody, and control of Counterdefendants or of production of documents that are not in the actual possession, custody, or control of Defendant specifically objects to this Request on the grounds that it seeks the analysis in its discovery responses.

Request also calls for a legal conclusion, and Defendant is not obligated to provide legal neither relevant to any party's claim or defense nor proportional to the needs of the case. This premature, overly broad, unduly burdensome, and seeks information or documents that are third parties. Defendant further specifically objects to this Request on the grounds that it is Defendant, but rather are in the possession, custody, and control of Counterdefendants or of production of documents that are not in the actual possession, custody, or control of Defendant specifically objects to this Request on the grounds that it seeks the analysis in its discovery responses.

**Response No. 59:**

All documents and communications upon which You intend to rely to support Your assertion that BMaddox or Brandon Maddox used Your likeness, image, and/or information for purposes of trade or advertising.

**REQUEST NO. 59**

Subject to and without waiving the foregoing General and Specific Objectives, and subject to a stipulated confidentiality agreement effective order, Defendant will produce any non-privileged documents within his actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

Request also calls for a legal conclusion, and Defendant is not obligated to provide legal neither relevant to any party's claim or defense nor proportional to the needs of the case. This premature, overly broad, unduly burdensome, and seeks information or documents that are third parties. Defendant further specifically objects to this Request on the grounds that it is Defendant, but rather are in the possession, custody, and control of Counterdefendants or of production of documents that are not in the actual possession, custody, or control of Defendant specifically objects to this Request on the grounds that it seeks the analysis in its discovery responses.

Request also calls for a legal conclusion, and Defendant is not obligated to provide legal neither relevant to any party's claim or defense nor proportional to the needs of the case. This premature, overly broad, unduly burdensome, and seeks information or documents that are third parties. Defendant further specifically objects to this Request on the grounds that it is Defendant, but rather are in the possession, custody, and control of Counterdefendants or of production of documents that are not in the actual possession, custody, or control of Defendant specifically objects to this Request on the grounds that it seeks the analysis in its discovery responses.

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Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of Counterdefendants. Defendant further specifically objects to this Request to the extent that it seeks documents protected from discovery under the attorney-client privilege, attorney work product doctrine, or any other applicable privilege or protection. Defendant further specifically objects to this Request on the grounds that it is wholly overly broad, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. This Request also calls for a legal conclusion, and Defendant is not obligated to provide legal analysis in its discovery responses.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within his actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

#### **REQUEST NO. 61**

Documents and communications sufficient to identify with specificity what information that was published about You that You claim invaded on Your right to privacy.

#### **Response No. 61:**

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of Counterdefendants or of third parties. Defendant further specifically objects to this Request on the grounds that it is overly broad and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. This Request also calls for a legal conclusion, and Defendant is not obligated to provide legal analysis in its discovery responses.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within his actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.



VERIFICATION I hereby declare under penalty of perjury that the facts stated in the foregoing DEFENDANT MILAD OSKOUIE'S RESPONSES AND OBJECTIONS TO PLAINTIFF AND COUNTERCLAIM DEFENDANTS. FIRST REQUESTS FOR THE PRODUCTION OF DOCUMENTS AND THINGS TO DEFENDANT MILAD OSKOUIE are true and correct to the best of my knowledge, information and belief.

Milad Oskouie



Dated: Tehran, Iran  
18 October 2019

**Certificate of Service**

I hereby certify that a true and correct copy of the foregoing document:

DEFENDANT MILAD OSKOUIE'S RESPONSES AND OBJECTIONS TO PLAINTIFF AND COUNTERCLAIM DEFENDANTS' FIRST REQUESTS FOR THE PRODUCTION OF DOCUMENTS AND THINGS TO DEFENDANT MILAD OSKOUIE

has been served via email on:

Anderson J. Duff, Esq.  
Revision Legal, PLLC  
244 5th Avenue, Suite 2230  
New York, NY 10001  
Phone: 212.996.4103  
E-mail: [anderson@revisionlegal.com](mailto:anderson@revisionlegal.com) and [ajd@revisionlegal.com](mailto:ajd@revisionlegal.com)

this 18<sup>th</sup> day of October, 2019



**Milad Oskouie**



**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

BMADDOX ENTERPRISES LLC,

Plaintiff,

v.

MILAD OSKOUIE, OSKO M LTD, and  
PLATINUM AVENUE HOLDINGS  
PTY, LTD,

Defendants.

MILAD OSKOUIE and PLATINUM  
AVENUE HOLDINGS PTY, LTD,

Counterclaimants,

v.

BMADDOX ENTERPRISES LLC and  
BRANDON MADDOX,

Counterdefendants.

Case No.: 1:17-cv-01889-RA-HBP

**DEFENDANT OSKO M LTD'S  
RESPONSES AND OBJECTIONS TO  
PLAINTIFF AND COUNTERCLAIM  
DEFENDANTS' FIRST REQUESTS FOR  
THE PRODUCTION OF DOCUMENTS  
AND THINGS TO DEFENDANT OSKO  
M LTD**

Pursuant to Federal Rules of Civil Procedure 26 and 34 Defendant Osko M Ltd. (“Defendant” or “Platinum”) hereby responds and objects to Plaintiff and Counterclaim Defendants’ First Requests for the Production of Documents and Things to Defendant Osko M Ltd (“Request(s)”) as set forth below. Defendant’s discovery efforts are continuing and they reserve the right to amend or supplement these responses and objections as necessary.

**INTRODUCTION**

Counterdefendants’ Requests seek massive amounts of information with respect to overly and unnecessarily broad subject areas, and with respect to matters defined or referred

information. Any inadvertent disclosure of such documents shall not be a waiver of the Product") or any other applicable privilege or immunity and will not produce such "Attorney-Client Privilege"), the work product doctrine, (hereinafter, "Attorney Work seeks documents and information protected by the attorney-client privilege (hereinafter, 1. Defendant objects to each and every request insofar as and to the extent it

## GENERAL QUALIFICATIONS AND OBJECTIONS

Countereffendants' Requests.

Requests are incorporated by reference in response to each and every one of Requests. This Introductory Statement and the following General Qualifications and Qualifications and Objectives and below responses to the individual paragraphs of the objections and improper for numerous additional reasons set forth in the below General supplement its responses to these Requests. Finally, Countereffendants' Requests are sensitive, and confidential. As discovery is continuing, Defendant reserves the right to Furthermore, Countereffendants' Requests seek documents that are, at least in part, secret, Countereffendants' possession or are available from other readily accessible sources. requests. Other documents requested by Countereffendants are already in outweighed by the burden, expense and inconvenience that would be required to answer the their relevance is marginal at most and their potential value in this litigation is substantially neither relevant to any party's claim or defense nor proportional to the needs of the case, or impractical. The overwhelming majority of responses to the requested Requests that are to in such a vague and uncertain manner as to make meaningful responses impossible or

attorney-client privilege, the work product doctrine, or any other applicable privilege or immunity.

2. Defendant objects to each and every request to the extent it calls for the production of documents that are neither relevant to the subject matter of this Action nor reasonably calculated to lead to the discovery of admissible evidence (hereinafter, “Relevance”).

3. Defendant objects to each and every request to the extent that they seek documents outside of the scope of Defendants’ knowledge (hereinafter, “Outside the Scope”).

4. Defendant object to each and every request the extent it is overly broad, vague and ambiguous, unduly burdensome or not reasonably calculated to lead to the discovery of admissible evidence (hereinafter, “Vague and Ambiguous” or “Overly Broad”).

5. Defendant objects to each and every request to the extent it is duplicative of a request previously asked (hereinafter, “Duplicative”).

6. Defendant objects to each and every request to the extent it improperly calls for a legal conclusion (hereinafter, “Legal Conclusion”).

7. Defendant objects to each and every request to the extent it is premature in nature (hereinafter, “Premature”).

8. Defendant objects to each and every request insofar as and to the extent it seeks divulgence of trade secrets, confidential or proprietary information of any third-party, (hereinafter, “Confidentiality”), provided, however, that such information may be disclosed subject to Defendant’s other general and specific objections, and subject to protective order.

Counterdefendants attempt to impose duties of supplementation or otherwise contrary to or

16. Defendant objects to Counterdefendants' Requests to the extent

that are not likely to lead to the discovery of admissible evidence.

not specify a time period relevant to the issues raised in this matter, such that seek documents

15. Defendant objects to Counterdefendants' Requests on the grounds that they do

cannot make meaningful responses to same.

to use terms that are not defined in the Definitions contained therein, such that Defendants

14. Defendant objects to Counterdefendants' Requests to the extent they purport

13. Defendant reserves the right to redact documents in response to the Requests.

involving or relating to the request.

document produced pursuant to this response, or (b) any other demand for discovery

thereof, (ii) statements made in this response to the Request of any part thereof, or (iii) any

competence, relevance, materiality, privilege or admissibility of (i) the Request or any part

wavier of or prejudice to Defendant's right at any later time, to raise objections to (a) the

12. Defendant is providing these responses and producing documents without

Defendant's actual possession, custody, or control.

11. Defendant objects to each Request to the extent that it seeks documents not in

obligations beyond those required by the Federal Rules.

10. Defendant objects to each Request to the extent it purports to impose

reserves the right to supplement each of its Requests.

Defendant is responding on the basis of its current knowledge and information. Defendant

9. Defendant objects to each and every request in its entirety on the ground that

inconsistent with the Federal Rules.

17. Defendant objects to the definitions of “Defendant,” “You,” and “Your” to the extent that they are overbroad and purport to include persons or entities that are not Defendant.

18. Defendant objects to Instruction Nos. 5-6 and the requested forms for producing electronically stored information. Defendant further objects to the aforesaid instructions to the extent they seek production of documents in more than one form. Defendant will produce responsive documents in the form in which they are ordinarily maintained or PDF, TIFF or Relativity production load files.

19. Defendant objects to Instruction No. 8 as vague as to the meanings of “non-identical copy” and “non-identical original.” Defendant further objects to the aforesaid instruction to the extent it seeks production of documents in more than one form.

20. Defendant objects to Instruction No. 10 to the extent that it attempts to impose duties contrary to or inconsistent with the Federal Rules.

21. Defendant’s responses herein are expressly subject to each of the foregoing “General Objections” and each of them are expressly incorporated by reference into each response.

22. Defendant reserves the right at any time to revise, correct, add to, or clarify the objections or responses set forth herein and the production made pursuant thereto. Each of the specific responses below are made subject to Defendant’s continuing investigation, and with the understanding that Defendant may supplement the specific responses and/or the documents produced in response at some point in the future.

Defendant specifically objects to this Request on the grounds that it is premature, overly broad, unduly specific, or any other applicable privilege or protection. Defendant further seeks documents protected from discovery under attorney-client privilege, attorney work product doctrine, or any other applicable privilege or protection. Defendant further seeks documents protected from discovery, custody, and control of Counterdefendants, or of third parties. Defendant further seeks specifically objects to this Request to the extent that it seeks Defendant, but rather are in the possession, custody, and control of Counterdefendants, or of production of documents that are not in the actual possession, custody, or control of Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of Counterdefendants, or of third parties. Defendant further seeks specifically objects to this Request to the extent that it seeks documents protected from discovery under attorney-client privilege, attorney work product doctrine, or any other applicable privilege or protection.

#### Response No. 2:

All documents and communications responsive to BMaddox's First Set of Interrogatories to Defendant Osko.

#### REQUEST NO. 2

Subject to and without waiving the foregoing General and Specific Objects, and subject to a stipulated confidentiality agreement order, Defendant will produce any non-privileged documents within its actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

Counterefendants to those documents to be produced in response to those requests. Request on the grounds that it is duplicative of subsequent, more specific requests, and refer claim or defense nor proportional to the needs of the case. Defendant further objects to this burdensome, and seeks information or documents that are neither relevant to any party's specific, and objects to this Request on the grounds that it is premature, overly broad, unduly specific, or any other applicable privilege or protection. Defendant further seeks documents protected from discovery under attorney-client privilege, attorney work product doctrine, or any other applicable privilege or protection. Defendant further seeks documents protected from discovery under attorney-client privilege, attorney work product doctrine, or any other applicable privilege or protection. Defendant further seeks documents protected from discovery under attorney-client privilege, attorney work product doctrine, or any other applicable privilege or protection. Defendant further seeks documents protected from discovery under attorney-client privilege, attorney work product doctrine, or any other applicable privilege or protection. Defendant further seeks documents protected from discovery under attorney-client privilege, attorney work product doctrine, or any other applicable privilege or protection.

#### Response No. 1:

All documents and communications relied upon or consulted by You in responding to BMaddox's First Set of Interrogatories to Defendant Osko.

#### REQUEST NO. 1

follows:

Subject to and without waiving such General Objects, Defendant responds as

burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. Defendant further objects to this Request on the grounds that it is duplicative of subsequent, more specific requests, and refer Counterdefendants to those documents to be produced in response to those requests.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within its actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

documents exist.

### **REQUEST NO. 3**

All documents and communications concerning the creation, maintenance, and administration of any and every iteration of the website or other content that has appeared at <FFLTrust.com>.

#### **Response No. 3:**

Defendant specifically objects to this Request on the grounds that it is overly broad, unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within its actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

### **REQUEST NO. 4**

All documents and communications concerning the management, administration, finances, financial record keeping, cash flow, or the manner in which You processed any money or benefit arising out of Your businesses, including but not limited to <FFLTrust.com>, <InfiniteConversions.com>, and <TheUnitutor.com>, during each of the past four (4) years, including documents sufficient to show gross sales, net profit, advertising expenditures, and online traffic to each website for each year.

#### **Response No. 4:**

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of

Documents and communications sufficient to identify every account You currently have or have had access to during the past four (4) years at any bank or other financial service

REQUEST NO. 6

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within its actual possession, custody or control that can be located after a reasonable diligent search that are responsive to this Request.

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of third parties. Defendant further objects to this Request to the extent that it seeks documents specifically relating to the possession, custody, and control of products that are not in the actual possession, custody, or control of Defendant. Defendant objects to this Request on the grounds that it seeks the production of documents that are neither further objects to this Request on the grounds that it is premature, overly broad (websites other than <FFLTtrust.com> are not at issue), vague as to the meaning of "electronic communication service" and "remote computing service," unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. Defendant further objects to this Request on the grounds that it is duplicative of subsequent or prior, more specific requests.

**Response No. 5:**

All documents and communications concerning each internet service provider, virtual private network service provider, electronic communication service, and remote computing service that provided services to You concerning the operation of [FFLTrust.com](http://FFLTrust.com), or [InfiniteConversions.com](http://InfiniteConversions.com) including any agreements, whether written or otherwise, between any such provider and any Defendant.

**REQUEST NO. 5**

Defendant, but rather are in the possession, custody, and control of third parties. Defendant further specifically objects to the extent that it seeks documents protected from discovery under the attorney-client privilege, attorney work product doctrine, or any other applicable privilege or protection. Defendant further specifically objects to this request on the grounds that it is premature, overly broad (websites other than <FFLTrust.com> are not at issue), unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. Defendant further objects to this Request on the grounds that it is duplicative of subsequent or prior, more specific requests.

provider, including any account that You share, draw from, or otherwise have access to but do not control.

**Response No. 6:**

Defendant specifically objects to this Request on the grounds that it is wholly overly broad, unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case.

**REQUEST NO. 7**

All documents and communications concerning any legal claims or lawsuits filed by or against You during the past ten (10) years.

**Response No. 7:**

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of Counterdefendants. Defendant further specifically objects to this Request on the grounds that it is wholly overly broad, vague as to the meaning of "legal claims," and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. Defendant further object to this Request on the grounds that it is duplicative of Request Nos. 15-16 directed Defendant Milad Oskouie.

**REQUEST NO. 8**

All documents and communications concerning every social media account You have, during the past four (4) years, used in connection with <FFLTrust.com>, <TheUnitutor.com>, <infiniteconversions.com> whether such account was owned by You or otherwise.

**Response No. 8:**

Defendant specifically objects to this Request to the extent that it seeks documents protected from discovery under the attorney-client privilege, attorney work product doctrine, or any other applicable privilege or protection. Defendant further specifically objects to this Request on the grounds that it is overly broad, vague and ambiguous as to the phrase "as a trademark," unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. This Request also calls for a legal conclusion, and Defendant is not obligated to provide legal analysis in its discovery responses. Defendants further object to this Request on the grounds that it is duplicative of Request No. 4 directed Defendant Milad Oskouie, and refers

Demand specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of third parties. Defendant specifically objects to this Request to the extent that it seeks documents that are not in the possession, custody, and control of Plaintiff.

**Response No. 10:**

All documents and communications concerning every edition of every educational product sold, distributed, or displayed by or at [FFLTrust.com](http://FFLTrust.com).

REQUEST NO. 10

Subject to and without waiving the foregoing General and Specific Objects, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within its actual possession, custody or control that can be located after a reasonable diligent search that are responsive to this Request.

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of third parties, including but not limited to the Bureau of Alcohol, Tobacco, Firearms and Explosives. Defendant further specifically objects to this Request on the grounds that it is overly broad, unduly burdensome, and seeks information or documents that is neither relevant to any party's claim or defense nor proportional to the needs of the case. Defendant further objects to this Request on the grounds that it is duplicative of subsequent, more specific requests, and refer Counterdefendants to those documents to be produced in response to those requests.

**Response No. 9:**

All materials upon which You or anyone working with or for You relied to create any content that did or was intended to appear at <FFLTTrust.com>.

REQUEST NO. 9

Subject to and without waiving the foregoing General and Specific Objectives, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within its actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

Counterdefendents to those documents to be produced in response to that Request.

applicable privilege or protection. Defendant further specifically objects to this Request on the grounds that it is overly broad, vague and ambiguous as to the phrase “educational product,” ambiguous as to the meaning of “edition,” ambiguous as to the meaning of “by or at” in the context of this Request, unduly burdensome, and seeks information or documents that are neither relevant to any party’s claim or defense nor proportional to the needs of the case. Defendant further objects to this Request on the grounds that it is duplicative of subsequent and prior requests.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within its actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

#### **REQUEST NO. 11**

All documents and communications You have sent or have caused to be sent out from any email account or online service provider to multiple third-parties at once or in rapid succession concerning federal firearms licensing in the United States, including documents and communications sufficient to identify each recipient of any such newsletter, list serve, or email blast and describe how recipients were able to opt-into receiving such communications or otherwise became designated as a recipient of the same.

#### **Response No. 11:**

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of third parties. Defendant specifically objects to this Request to the extent that it seeks documents protected from discovery under the attorney-client privilege, attorney work product doctrine, or any other applicable privilege or protection. Defendant further specifically objects to this Request on the grounds that it is wholly overly broad, vague and ambiguous as to the phrase “online service provider,” ambiguous as to the meaning of “opt-into,” ambiguous as to the meaning of “in rapid succession” in the context of this Request, unduly burdensome, and seeks information or documents that are neither relevant to any party’s claim or defense nor proportional to the needs of the case. Defendant further objects to this Request to the extent it directs Defendant to “describe” anything. Defendant further objects to this Request on the grounds that it is duplicative of subsequent and prior requests.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within its actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

All documents and communications concerning any damages You claim to have suffered in this action.

REQUEST NO. 14

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement or protective order, Defendant will produce any non-privileged documents within its actual possession, custody or control that can be located after a reasonable search that are responsive to this Request.

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of other Defendants or of third parties. Defendant specifically objects to this Request to the extent that it seeks documents protected from discovery under the attorney-client privilege, attorney work product doctrine, or any other applicable privilege or protection. Defendant further objects to this Request on the grounds that it is wholly overly broad, ambiguous, and as to the meaning of "employed" in the context of this Request, unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. Defendant further objects to this Request on the grounds that it is duplicative of subsequent and prior requests.

**Response No. 13:**

All documents and communications concerning every third party employed by You, Defendant Osko, or Defendant Platinum in connection with FFL Trust.com».

REQUEST NO. 13

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of other Defendants. Defendant further specifies its objection to this Request on the grounds that it is wholly overbroad, vague as to the meaning of "quality," unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case.

Response No. 12:

Documents sufficient to show the nature and quality of Your services.

REQUEST NO. 12

**Response No. 14:**

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of Counterdefendants. Defendant further objects to this Request on the grounds that it is premature, overly broad, unduly burdensome, seeks confidential or proprietary information.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, no responsive documents exist.

**REQUEST NO. 15**

All documents and communications concerning Your role in the creation, maintenance, administration, or management of <FFLTrust.com>.

**Response No. 15:**

Defendant specifically objects to this Request to the extent that it seeks documents protected from discovery under the attorney-client privilege, attorney work product doctrine, or any other applicable privilege or protection. Defendant further specifically objects to this Request on the grounds that it is wholly overly broad, ambiguous as to the meaning of "role" in the context of this Request, unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. Defendant further objects to this Request on the grounds that it is duplicative of subsequent and prior requests.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within its actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

**REQUEST NO. 16**

All documents and communications concerning the creation, acquisition, or inclusion of any federal firearms license that appears or has appeared in any materials sold, distributed, or displayed by or at <FFLTrust.com>.

**Response No. 16:**

Documents and things sufficient to identify every computer, tablet, cellular phone, notebook, laptop, or other computing device that You have owned, leased, or regularly used, at work or located after a reasonable and diligent search that are responsive to this Request.

#### REQUEST NO. 18

Subject to and without waiving the foregoing General and Specific Objectives, and any non-privileged documents within its actual possession, custody or control that can be subject to a stipulated confidentiality agreement and protective order, Defendant will produce Defendant to a reasonable and diligent search that are responsive to this Request.

Duplicate of subsequent and prior requests.

Defendant further objects to this Request on the grounds that it is duplicative of the case. Defendant further objects to this Request on the grounds that it is neither relevant to any party's claim or defense nor proportional to the needs of the case. Defendant further objects to this Request on the grounds that it is neither relevant to any party's claim or defense nor proportional to the needs of the case. Defendant further objects to this Request on the grounds that it is unduly burdensome, and seeks information or documents that are neither relevant to this case, unduly burdensome, and seeks information or (other domains are not at issue in this case), unduly burdensome, and seeks overly broad further specifically objects to this Request on the grounds that it is wholly overbroad.

Defendant, but rather are in the possession, custody, and control of third parties. Defendant production of documents that are not in the actual possession, custody, or control of

Defendant specifically objects to this Request on the grounds that it seeks the

#### Response No. 17:

Documents and communications sufficient to identify every domain that You own, control, manage, or administer.

#### REQUEST NO. 17

Subject to and without waiving the foregoing General and Specific Objectives, and any non-privileged documents within its actual possession, custody or control that can be subject to a stipulated confidentiality agreement and protective order, Defendant will produce Defendant to a reasonable and diligent search that are responsive to this Request.

Grounds that it is duplicative of subsequent and prior requests.

Defendant further objects to this Request on the grounds that it is neither relevant to any party's claim or defense nor proportional to the needs of the case. Defendant further objects to this Request on the grounds that it is unduly burdensome, and seeks information or inclusion of, in the context of this Request, unduly burdensome, and creation, acquisition, or inclusion of, vague and ambiguous as to the phrase "the applicable privilege or protection. Defendant further specifically objects to this Request on discovery under the attorney-client privilege, attorney work product doctrine, or any other specificially objects to this Request to the extent that it seeks documents protected from Defendant, but rather are in the possession, custody, and control of third parties. Defendant production of documents that are not in the actual possession, custody, or control of Defendant specifically objects to this Request on the grounds that it seeks the

otherwise, during the past four (4) years.

**Response No. 18:**

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of third parties. Defendant further specifically objects to this Request to the extent that it seeks documents protected from discovery under the attorney-client privilege, attorney work product doctrine, or any other applicable privilege or protection. Defendant further specifically objects to this Request on the grounds that it is overly broad, vague as to the meaning of "regularly used," unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case.

**REQUEST NO. 19**

All documents and communications concerning any claim You have made to own any rights protected by copyright in connection with <infiniteconversions.com>, <TheUnitutor.com>, <FFLTrust.com>, or any other content during the past four (4) years.

**Response No. 19:**

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of third parties. Defendant further specifically objects to this Request on the grounds that it is wholly overly broad (other websites are not at issue), vague and ambiguous as to the meaning of the phrase "any claim You have made to own any rights protected by copyright," unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. This Request also calls for a legal conclusion, and Defendant is not obligated to provide legal analysis in its discovery responses.

Dated: Tehran, Iran  
18 October 2019



Milad Oskouie

Milad Oskouie



this 18<sup>th</sup> Day of October 2019

E-mail: anderson@revisionlegal.com and asd@revisionlegal.com  
Phone: 212.996.4103  
New York, NY 10001  
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Anderson J. Duff, Esq.  
Anderson J. Duff, Esq.

has been served via email on:

DEFENDANT OSKO LTD'S RESPONSES AND OBJECTIONS TO PLAINTIFF  
AND COUNTERCLAIM DEFENDANTS, FIRST REQUESTS FOR THE  
PRODUCTION OF DOCUMENTS AND THINGS TO DEFENDANT OSKO LTD

I hereby certify that a true and correct copy of the foregoing document:

Certificate of Service



are true and correct to the best of my knowledge, information and belief.

PLAINTIFF AND COUNTERCLAIM DEFENDANTS, FIRST REQUESTS FOR THE  
PRODUCTION OF DOCUMENTS AND THINGS TO DEFENDANT OSKO LTD  
FORGOING DEFENDANT OSKO LTD'S RESPONSES AND OBJECTIONS TO  
VERIFICATION I hereby declare under penalty of perjury that the facts stated in the





**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

BMADDOX ENTERPRISES LLC,

Plaintiff,

v.

MILAD OSKOUIE, OSKO M LTD, and  
PLATINUM AVENUE HOLDINGS  
PTY, LTD,

Defendants.

MILAD OSKOUIE and PLATINUM  
AVENUE HOLDINGS PTY, LTD,

Counterclaimants,

v.

BMADDOX ENTERPRISES LLC and  
BRANDON MADDOX,

Counterdefendants.

Case No.: 1:17-cv-01889-RA-HBP

**DEFENDANT OSKO M LTD'S  
RESPONSES AND OBJECTIONS TO  
PLAINTIFF AND COUNTERCLAIM  
DEFENDANTS' FIRST SET OF  
INTERROGATORIES TO DEFENDANT  
OSKO M LTD**

Pursuant to Federal Rules of Civil Procedure 26 and 33 Defendant Osko M, Ltd (“Defendant” or “Osko”) hereby responds and objects to Plaintiff and Counterclaim Defendants’ First Set of Interrogatories to Defendant Osko M, Ltd (“Interrogatory(ies)”) as set forth below. Defendant’s discovery efforts are continuing and they reserve the right to amend or supplement these responses and objections as necessary.

**GENERAL QUALIFICATIONS AND OBJECTIONS**

1. Defendant objects to each interrogatory to the extent it seeks privileged attorney-client communications, protected work product, trade secrets or confidential and/or proprietary information.

9. Defendants reserve the right to supplement their responses to Plaintiff's "General Objections" and each of them are expressly incorporated by reference into each response.
8. Defendant's responses herein are expressly subject to each of the foregoing needs of the case.
7. Defendant objects to Plaintiff's interrogatories on the grounds that they do not specify a time period relevant to the issues raised in this matter, such that seek documents that are not likely to lead to the discovery of admissible evidence nor proportional to the needs of the case.
6. Defendant objects to the definition of "Defendant" to the extent it is overbroad and purports to include persons or entities that are not Defendant.
5. Defendant objects to each interrogatory to the extent that it is premature in nature.
4. Defendant objects to each interrogatory to the extent it is overbroad, vague, ambiguous, unduly burdensome, not sufficiently limited in scope, undefined and subject to different interpretations in different contexts.
3. Defendant objects to each interrogatory to the extent it purports to impose orders entered in this matter.
2. Defendant objects to each interrogatory to the extent it calls for irrelevant information not reasonably calculated to lead to the discovery of admissible evidence nor proportional to the needs of the case.

Interrogatories as more information becomes known.

10. Each of the foregoing General Objections is incorporated within each of the responses set forth herein.

11. Defendant objects to Instruction No. 2 to the extent that it attempts to impose duties contrary to or inconsistent with the Federal Rules.

Subject to and without waiving such General Objections, Defendant responds as follows:

**INTERROGATORY NO. 1**

Identify each person who participated in, assisted with, or provided any information used in the preparation of the website appearing at <ffltrust.com>.

**Response No. 1:**

Defendant specifically objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. Defendant further objects to this Interrogatory under Local Rule 33.3(b) because request for production of documents and/or depositions are more practical methods of obtaining the information sought. In this respect, Defendant anticipates that it will produce documents that will contain the information requested to the extent that Counterdefendants requested such documents via its document requests and to the extent such documents exist in Defendant's possession, custody and control. Further, upon request and within the limits of Fed. R. Civ. P. 30 and other applicable rules and orders, Defendant will make one or more witnesses available to provide responsive deposition testimony.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant also refers Counterdefendants to Defendants' initial disclosures.

**INTERROGATORY NO. 2**

Identify each person who has personal knowledge concerning the subject matter of this litigation including but not limited to the allegations set forth in the Complaint and the Counterclaims.

Defendant specifically objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, and seeks information or documents that are neither relevant to any party's claim nor proportional to the needs of the case. Defendant further objects to this interrogatory as violating Fed. R. Civ. P. 33(a) to the extent that the total number of interrogatories (including subparts) proposed by Plaintiff exceeds twenty-five (25). Defendant further objects to this interrogatory under Local Rule 33.3(b) because Plaintiff produced such documents via its document requests and to the extent such documents that will contain the information requested to the extent that Counterdefendants obtaining the information sought. In this respect, Defendant anticipates that it will produce documents that will specify the information requested to the extent that Counterdefendants requested for production of documents and/or depositions are more practical methods of obtaining the information sought.

**Response No. 3:**

Identify each person who has personal knowledge concerning the management, administration, finances, financial record keeping, cash flow, or the manner in which Osko processed any money or benefit arising out of its businesses, including but not limited to [FFLTTrust.com](http://FFLTrust.com), [InfiniteConversions.com](http://InfiniteConversions.com), and [TheUmitutor.com](http://TheUmitutor.com) during the past four years.

INTERROGATORY NO. 3

Defendant specifically objects to this interrogatory as violating Fed. R. Civ. P. 33(a) to the extent that the total number of interrogatories (including subparts) propounded by Plaintiff exceeds twenty-five (25). Defendant further objects to this interrogatory under Local Rule 33.3(b) because any party's claim or defense nor proportional to the needs of the case. Defendant further objects to this interrogatory as burdensome, and seeks information or documents that are neither relevant to broad, unduly burdensome, and grounds that it is overly specific to this interrogatory on the initial disclosure.

(25) Plaintiff further objects to this interrogatory under Local Rule 33.3(b) because Plaintiff's claim or defense nor proportional to the needs of the case. Plaintiff further requests for production of documents and/or depositions are more practical methods of obtaining the information sought. In this respect, Defendant anticipates that it will produce documents that will contain the information requested to the extent that Counterdefendants requested such documents via its document requests and to the extent such documents exist in Defendant's possession, custody and control. Further, upon request and within the limits of Fed. R. Civ. P. 30 and other applicable rules and orders, Defendant will make one or more witnessses available to provide responsive deposition testimony.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant also refers Counterdefendants to Defendants' initial disclosures.

**Response No. 2:**

in Defendant's possession, custody and control. Further, upon request and within the limits of Fed. R. Civ. P. 30 and other applicable rules and orders, Defendant will make one or more witnesses available to provide responsive deposition testimony.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant also refers Counterdefendants to Defendants' initial disclosures.

#### **INTERROGATORY NO. 4**

Identify each internet service provider, cell phone provider, virtual private network service provider, electronic communication service, and remote computing service that provided any service to You concerning the operation of <FFLTrust.com>, <TheUnitutor.com>, or <InfiniteConversions.com> as well as each agreement, whether written or otherwise made, between any such service provider and Yourself.

##### **Response No. 4:**

Defendant specifically objects to this s Interrogatory on the grounds that it is overly broad, unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. Defendant further objects to this interrogatory as violating Fed. R. Civ. P. 33(a) to the extent that the total number of interrogatories (including subparts) propounded by Plaintiff exceeds twenty-five (25). Defendant further objects to this Interrogatory under Local Rule 33.3(b) because request for production of documents and/or depositions are more practical methods of obtaining the information sought. In this respect, Defendant anticipates that it will produce documents that will contain the information requested to the extent that Counterdefendants requested such documents via its document requests and to the extent such documents exist in Defendant's possession, custody and control. Further, upon request and within the limits of Fed. R. Civ. P. 30 and other applicable rules and orders, Defendant will make one or more witnesses available to provide responsive deposition testimony.

#### **INTERROGATORY NO. 5**

Identify each resource upon to create the content that has appeared on <FFLTrust.com> at any point in time.

##### **Response No. 5:**

Defendant specifically objects to this s Interrogatory on the grounds that it is overly broad, vague as to the phrase "upon to create," unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the

Subject to and without waiving the foregoing General and Specific Objectives, and

Defendant specifically objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. Defendant further objects to this interrogatory as violating Fed. R. Civ. P. 33(a) to the extent that the total number of interrogatories (including subparts) proposed by Plaintiff exceeds twenty-five (25). Defendant also objects to this interrogatory as in violation of Local Rule 33.3(a). Defendant further objects to this interrogatory under Local Rule 33.3(b) because request for production of documents and/or depositions are more practical methods of obtaining the information sought.

Response No. 7:

**Identify every office You have maintained or currently maintain.**

INTERROGATORY NO. 7

Demandant specifically objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome, and seeks information or documents that are neither relevant to any party's claim nor proportional to the needs of the case. Demandant also objects to this Interrogatory as in violation of Local Rule 33(a). Demandant further objects to this Interrogatory as violating Fed. R. Civ. P. 33(a) to the extent that the total number of interrogatories (including subparts) proposed by Plaintiff exceeds twenty-five (25). Defendant further objects to this Interrogatory under Local Rule 33.3(b) because request for production of documents and/or depositions are more practical methods of obtaining the information sought.

Response No. 6:

Identify every computer, tablet, cellular phone, notebook, laptop, or other computing device that You have owned, leased, or regularly used, at work or otherwise, during the past four (4) years.

INTERROGATORY NO. 6

needs of the case. Defendant further objects to this interrogatory as violates Fed. R. Civ. P. 33(a) to the extent that the total number of interrogatories (including subparts) proposed by Plaintiff exceeds twenty-five (25). Defendant also objects to this interrogatory as violates Local Rule 33.3(a). Defendant further objects to this interrogatory under Local Rule 33.3(b) because request for production of documents and/or depositions are more practical methods of obtaining the information sought.

subject to a stipulated confidentiality agreement and protective order, Defendant responds as follows: none.

**INTERROGATORY NO. 8**

Identify every copyright registration You own or have owned in any jurisdiction.

**Response No. 8:**

Defendant specifically objects to this s Interrogatory on the grounds that it is overly broad, unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. Defendant also objects to this Interrogatory as in violation of Local Rule 33.3(a). Defendant further objects to this interrogatory as violating Fed. R. Civ. P. 33(a) to the extent that the total number of interrogatories (including subparts) propounded by Plaintiff exceeds twenty-five (25). Defendant further objects to this Interrogatory under Local Rule 33.3(b) because request for production of documents and/or depositions are more practical methods of obtaining the information sought.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant responds as follows: none.

Dated: Tehran, Iran  
October 18<sup>th</sup>, 2019



Milad Oskouie

*Milad Oskouie*



this 18<sup>th</sup> day of October, 2019

E-mail: anderson@revisionlegal.com and sjd@revisionlegal.com  
Phone: 212.996.4103  
New York, NY 10001  
244 5th Avenue, Suite 2230  
Revision Legal, PLLC  
Anderson J. Duff, Esq.  
Anderson J. Duff, Esq.

has been served via email on:

DEFENDANT OSKO LTD AND COUNTERCLAIM DEFENDANTS, FIRST SET OF INTERROGATORIES TO DEFENDANT OSKO LTD'S RESPONSES AND OBJECTIONS TO PLATINUM AND COUNTERCLAIM DEFENDANTS, FIRST SET OF INTERROGATORIES TO

I hereby certify that a true and correct copy of the foregoing document:

Certificate of Service

*Milad Oskouie*



my knowledge, information and belief.

INTERROGATORIES TO DEFENDANT OSKO LTD are true and correct to the best of PLATINUM AND COUNTERCLAIM DEFENDANTS, FIRST SET OF PLATINUM AND COUNTERCLAIM DEFENDANTS, FIRST SET OF foregoing DEFENDANT OSKO LTD'S RESPONSES AND OBJECTIONS TO foregoing DEFENDANT OSKO LTD'S RESPONSES AND OBJECTIONS TO the facts stated in the VERIFICATION I hereby declare under penalty of perjury that the facts stated in the

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

BMADDOX ENTERPRISES LLC,

Plaintiff,

v.

MILAD OSKOUIE, OSKO M LTD, and  
PLATINUM AVENUE HOLDINGS  
PTY, LTD,

Defendants.

MILAD OSKOUIE and PLATINUM  
AVENUE HOLDINGS PTY, LTD,

Counterclaimants,

v.

BMADDOX ENTERPRISES LLC and  
BRANDON MADDOX,

Counterdefendants.

Case No.: 1:17-cv-01889-RA-HBP

**DEFENDANT PLATINUM AVENUE  
HOLDINGS PTY, LTD'S RESPONSES  
AND OBJECTIONS TO PLAINTIFF  
AND COUNTERCLAIM DEFENDANTS'  
FIRST REQUESTS FOR THE  
PRODUCTION OF DOCUMENTS AND  
THINGS TO DEFENDANT PLATINUM  
AVENUE HOLDINGS PTY, LTD**

Pursuant to Federal Rules of Civil Procedure 26 and 34 Defendant Platinum Avenue Holdings Pty, Ltd. (“Defendant” or “Platinum”) hereby responds and objects to Plaintiff and Counterclaim Defendants’ First Requests for the Production of Documents and Things to Defendant Platinum Avenue Holdings Pty, Ltd (“Request(s)”) as set forth below. Defendant’s discovery efforts are continuing and they reserve the right to amend or supplement these responses and objections as necessary.

“Attorney-Client Privilege”), the work product doctrine, (hereinafter, “Attorney Work  
seeks documents and information protected by the attorney-client privilege (hereinafter,  
1. Defendant objects to each and every request insofar as and to the extent it

## GENERAL QUALIFICATIONS AND OBJECTIONS

Countereffendants’ Requests.

Requests are incorporated by reference in response to each and every one of  
Requests. This introductory Statement and the following General Qualifications and  
Qualifications and Objectives and below responses to the individual paragraphs of the  
objectionable and improper for numerous additional reasons set forth in the below General  
supplement its responses to these Requests. Finally, Countereffendants’ Requests are  
sensitive, and confidential. As discovery is continuing, Defendant reserves the right to  
Furthermore, Countereffendants’ Requests seek documents that are, at least in part, secret.  
Countereffendants’ possession or are available from other readily accessible sources.  
requested Requests. Other documents requested by Countereffendants are already in  
outweighed by the burden, expense and inconvenience that would be required to answer the  
their relevance is marginal at most and their potential value in this litigation is substantially  
neither relevant to any party’s claim or defense nor proportional to the needs of the case, or  
impractical. The overwhelming majority of responses to the requested Requests that are  
to in such a vague and uncertain manner as to make meaningful responses impossible or  
overly and unnecessarily broad subject areas, and with respect to matters defined or referred  
Countereffendants’ Requests seek massive amounts of information with respect to

## INTRODUCTION

Product") or any other applicable privilege or immunity and will not produce such information. Any inadvertent disclosure of such documents shall not be a waiver of the attorney-client privilege, the work product doctrine, or any other applicable privilege or immunity.

2. Defendant objects to each and every request to the extent it calls for the production of documents that are neither relevant to the subject matter of this Action nor reasonably calculated to lead to the discovery of admissible evidence (hereinafter, "Relevance").

3. Defendant objects to each and every request to the extent that they seek documents outside of the scope of Defendants' knowledge (hereinafter, "Outside the Scope").

4. Defendant object to each and every request the extent it is overly broad, vague and ambiguous, unduly burdensome or not reasonably calculated to lead to the discovery of admissible evidence (hereinafter, "Vague and Ambiguous" or "Overly Broad").

5. Defendant objects to each and every request to the extent it is duplicative of a request previously asked (hereinafter, "Duplicative").

6. Defendant objects to each and every request to the extent it improperly calls for a legal conclusion (hereinafter, "Legal Conclusion").

7. Defendant objects to each and every request to the extent it is premature in nature (hereinafter, "Premature").

8. Defendant objects to each and every request insofar as and to the extent it seeks divulgence of trade secrets, confidential or proprietary information of any third-party,

- that are not likely to lead to the discovery of admissible evidence.
- not specify a time period relevant to the issues raised in this matter, such that seek documents 15. Defendant objects to Counterdefendants' Requests on the grounds that they do cannot make meaningful responses to same.
- to use terms that are not defined in the Definitions contained therein, such that Defendants 14. Defendant objects to Counterdefendants' Requests to the extent they purport to reserves the right to redact documents in response to the Requests.
- involving or relating to the request.
- document produced pursuant to this response, or (b) any other demand for discovery thereof, (ii) statements made in this response to the Request of any part thereof, or (iii) any competence, relevance, materiality, privilege or admissibility of (i) the Request or any part 13. Defendant reserves the right to redact documents in response to the Requests.
- wavier of or prejudice to Defendant's right at any later time, to raise objections to (a) the 12. Defendant is providing these responses and producing documents without Defendant's actual possession, custody, or control.
- obligations beyond those required by the Federal Rules.
10. Defendant objects to each Request to the extent it purports to impose reserves the right to supplement each of its Requests.
- Defendant is responding on the basis of its current knowledge and information. Defendant 9. Defendant objects to each and every request in its entirety on the ground that subject to Defendant's other general and specific objections, and subject to protective order, (hereinafter, "Confidentiality"), provided, however, that such information may be disclosed

16. Defendant objects to Counterdefendants' Requests to the extent Counterdefendants attempt to impose duties of supplementation or otherwise contrary to or inconsistent with the Federal Rules.

17. Defendant objects to the definitions of "Defendant," "You," and "Your" to the extent that they are overbroad and purport to include persons or entities that are not Defendant.

18. Defendant objects to Instruction Nos. 5-6 and the requested forms for producing electronically stored information. Defendant further objects to the aforesaid instructions to the extent they seek production of documents in more than one form. Defendant will produce responsive documents in the form in which they are ordinarily maintained or PDF, TIFF or Relativity production load files.

19. Defendant objects to Instruction No. 8 as vague as to the meanings of "non-identical copy" and "non-identical original." Defendant further objects to the aforesaid instruction to the extent it seeks production of documents in more than one form.

20. Defendant objects to Instruction No. 10 to the extent that it attempts to impose duties contrary to or inconsistent with the Federal Rules.

21. Defendant's responses herein are expressly subject to each of the foregoing "General Objections" and each of them are expressly incorporated by reference into each response.

22. Defendant reserves the right at any time to revise, correct, add to, or clarify the objections or responses set forth herein and the production made pursuant thereto. Each of the specific responses below are made subject to Defendant's continuing investigation,

Defendant, but rather are in the possession, custody, and control of Counterdefendants, or of production of documents that are not in the actual possession, custody, or control of Defendant specifically objects to this Request on the grounds that it seeks the Defendant platinum.

**Response No. 2:**

All documents and communications responsive to BMaddox's First Set of Interrogatories to Defendant Platinum.

**REQUEST NO. 2**

Subject to and without waiving the foregoing General and Specific Objectives, and subject to a stipulated confidentiality agreement within its subsequent, custodial or control that can be any non-privileged documents within its actual possession, custody, or control of Defendant will produce located after a reasonable and diligent search that are responsive to this Request.

Request on the grounds that it is duplicative of subsequent, more specific requests, and refer claim or defense nor proportional to the needs of the case. Defendant further objects to this burdensome, and seeks information or documents that are neither relevant to any party's specifically objects to this Request on the grounds that it is premature, overly broad, unduly product doctrine, or any other applicable privilege or protection. Defendant further documents protected from discovery under the attorney-client privilege, attorney work third parties. Defendant further specifically objects to this Request to the extent that it seeks Defendant, but rather are in the possession, custody, and control of Counterdefendants, or of production of documents that are not in the actual possession, custody, or control of Counterdefendants to those documents that are in the possession, custody, or control of Counterdefendants to be produced in response to those requests.

**Response No. 1:**

All documents and communications relied upon or consulted by Defendant Platinum in responding to BMaddox's First Set of Interrogatories to Defendant Platinum.

**REQUEST NO. 1**

follows:

Subject to and without waiving such General Objectives, Defendant responds as

and with the understanding that Defendant may supplement the specific responses and/or the documents produced in response at some point in the future.

third parties. Defendant further specifically objects to this Request to the extent that it seeks documents protected from discovery under the attorney-client privilege, attorney work product doctrine, or any other applicable privilege or protection. Defendant further specifically objects to this Request on the grounds that it is premature, overly broad, unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. Defendant further objects to this Request on the grounds that it is duplicative of subsequent, more specific requests, and refer Counterdefendants to those documents to be produced in response to those requests.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within its actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

### **REQUEST NO. 3**

All documents and communications concerning Your alleged use of MILAD OSKOUIE as a trademark.

#### **Response No. 3:**

Defendant specifically objects to this Request to the extent that it seeks documents protected from discovery under the attorney-client privilege, attorney work product doctrine, or any other applicable privilege or protection. Defendant further specifically objects to this Request on the grounds that it is premature, overly broad, vague and ambiguous as to the phrase "as a trademark," unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. This Request also calls for a legal conclusion, and Defendant is not obligated to provide legal analysis in its discovery responses. Defendant further objects to this Request on the grounds that it is duplicative of subsequent, more specific requests, and refer Counterdefendants to those documents to be produced in response to those requests.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, no responsive documents exist.

### **REQUEST NO. 4**

All documents and communications concerning the creation, maintenance, and administration of any and every iteration of the website or other content that has appeared at <FFLTrust.com>.

**Response No. 6:**

All documents and communications concerning the management, administration, finances, financial record keeping, cash flow, or the manner in which You processed any money or benefit arising out of Your businesses, including but not limited to <FFLTrust.com>, <InfiniteConversions.com>, and <TheUnitutor.com>, during each of the past four (4) years, including documents sufficient to show gross sales, net profit, advertising expenditures, and online traffic to each website for each year.

**REQUEST NO. 6**

Subject to and without waiving the foregoing General and Specific Objectives, and located after a reasonable and diligent search that are responsive to this Request. Any non-privileged documents within its actual possession, custody or control that can be subject to a stipulated confidentiality agreement and protective order, Defendant will produce any other applicable privilege or protection. Defendant further specifically objects to this ambiguous as to the meaning of "educational materials," and seeks information or documents that are neither relevant to any party's claim nor defense nor proportional to the needs of the case.

Request on the grounds that it is overly broad, vague as the term "market research," or any other applicable privilege or protection. Defendant further specifically objects to this protected from discovery under the attorney-client privilege, attorney work product doctrine, defendant specifically objects to the extent that it seeks documents or any other applicable privilege or protection. Defendant further specifically objects to this request to and without waiving the foregoing General and Specific Objectives, and seeks to the extent that it seeks documents that are neither relevant to any party's claim nor defense nor proportional to the needs of the case.

**Response No. 5:**

All documents and communications concerning any market research conducted by or for You or at Your direction concerning any educational materials in the field of federal firearms licensing under United States law.

**REQUEST NO. 5**

Subject to and without waiving the foregoing General and Specific Objectives, and located after a reasonable and diligent search that are responsive to this Request. Any non-privileged documents within its actual possession, custody or control that can be subject to a stipulated confidentiality agreement and protective order, Defendant will produce any other applicable privilege or protection. Defendant further specifically objects to this request to and without waiving the foregoing General and Specific Objectives, and seeks to the extent that it is overly broad,

Defendant specifically objects to this Request on the grounds that it is overly broad, unduly burdensome, and seeks information or documents that are neither relevant to any party's claim nor defense nor proportional to the needs of the case.

**Response No. 4:**

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of third parties. Defendant further specifically objects to this Request to the extent that it seeks documents protected from discovery under the attorney-client privilege, attorney work product doctrine, or any other applicable privilege or protection. Defendant further specifically objects to this Request on the grounds that it is premature, overly broad (websites other than <FFLTrust.com> are not at issue), unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. Defendant further objects to this Request on the grounds that it is duplicative of subsequent or prior, more specific requests.

#### **REQUEST NO. 7**

All documents and communications concerning each internet service provider, virtual private network service provider, electronic communication service, and remote computing service that provided services to You concerning the operation of <FFLTrust.com>, <TheUnitutor.com>, or <InfiniteConversions.com> including any agreements, whether written or otherwise, between any such provider and any Defendant.

#### **Response No. 7:**

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of third parties. Defendant further specifically objects to this Request to the extent that it seeks documents protected from discovery under the attorney-client privilege, attorney work product doctrine, or any other applicable privilege or protection. Defendant further specifically objects to this Request on the grounds that it is premature, overly broad (websites other than <FFLTrust.com> are not at issue), vague as to the meaning of "electronic communication service" and "remote computing service," unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. Defendant further objects to this Request on the grounds that it is duplicative of subsequent or prior, more specific requests.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within its actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

#### **REQUEST NO. 8**

**Response No. 10:**

All documents and communications concerning any damages You claim to have suffered as a result of actions taken by Brandon Maddox or Brandon Maddox.

**REQUEST NO. 10**

Defendant specifically objects to this Request on the grounds that it is wholly overly broad, unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case.

**Response No. 9:**

Documents and communications sufficient to identify every account You currently have or have had access to during the past four (4) years at any bank or other financial service provider, including any account that You share, draw from, or otherwise have access to but do not control.

**REQUEST NO. 9**

Subject to and without waiving the foregoing General and Specific Objects, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within its actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

Counterevenants to those documents to be produced in response to those requests. Request on the grounds that it is duplicative of subsequent, more specific requests, and refer claim or defense nor proportionate to the case. Defendant further objects to this burdensome, and seeks information or documents that are neither relevant to any party's specifically objects to this Request on the grounds that it is premature, overly broad, unduly burdensome, or any other applicable privilege or protection. Defendant further products protected from discovery under the attorney-client privilege, attorney work product doctrine. Defendant further objects to this Request to the extent that it seeks third parties. Defendant further objects to this Request to the extent that it seeks documentation of documents that are not in the possession, custody, or control of Counterevenants, or of Defendant, but rather are in the possession, custody, and control of Counterdefendants, or of production of documents that are not in the actual possession, custody, or control of Defendant specifically objects to this Request on the grounds that it seeks the

**Response No. 8:**

All documents and communications concerning any damages You claim to have suffered as a result of actions taken by Brandon Maddox or Brandon Maddox.

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of Counterdefendants. Defendant further specifically objects to this Request on the grounds that it is wholly overly broad, vague as to the meaning of “legal claims,” and seeks information or documents that are neither relevant to any party’s claim or defense nor proportional to the needs of the case. Defendant further object to this Request on the grounds that it is duplicative of Request Nos. 15-16 directed to Defendant Milad Oskouie.

#### **REQUEST NO. 11**

All documents and communications concerning every social media account You have, during the past four (4) years, used in connection with <FFLTrust.com>, <TheUnitutor.com>, <infiniteconversions.com> whether such account was owned by You or otherwise.

#### **Response No. 11:**

Defendant specifically objects to this Request to the extent that it seeks documents protected from discovery under the attorney-client privilege, attorney work product doctrine, or any other applicable privilege or protection. Defendant further specifically objects to this Request on the grounds that it is overly broad, vague and ambiguous as to the phrase “as a trademark,” unduly burdensome, and seeks information or documents that are neither relevant to any party’s claim or defense nor proportional to the needs of the case. This Request also calls for a legal conclusion, and Defendant is not obligated to provide legal analysis in its discovery responses. Defendants further object to this Request on the grounds that it is duplicative of Request No. 4 directed to Defendant Milad Oskouie, and refers Counterdefendants to those documents to be produced in response to that Request.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within its actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

#### **REQUEST NO. 12**

All materials upon which You or anyone working with or for You relied to create any content that did or was intended to appear at <FFLTrust.com>.

#### **Response No. 12:**

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of

**REQUEST NO. 14**

Subject to and without waiving the foregoing General and Specific Objectives, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within its actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

Defendant further objects to this Request on the grounds that it is duplicative of the case. Defendant further objects to any party's claim or defense nor proportionate to the needs of the case, that are neither relevant to any party's claim or defense nor proportional to the needs of the case, "in the context of this Request, unduly burdensome, and seeks information or documents at," subsequent and prior requests. Defendant further objects to this Request on the grounds that it is overly broad, vague and ambiguous as to the phrase "educational products," "ambiguously as to the meaning of "edition," "by or for," "any other attorney-client privilege or protection. Defendant further objects to this Request on the grounds that it is discoverable under the attorney-client privilege, attorney work product doctrine, or any other applicable privilege or protection. Defendant further objects to the extent that it seeks documents produced from specifically objects to this Request on the grounds that it is attorney-client privilege, attorney work product doctrine, or any other attorney-client privilege or protection. Defendant, but rather are in the possession, custody, and control of third parties. Defendant produces documents that are not in the actual possession, custody, or control of Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the possession, custody, or control of third parties. Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the possession, custody, or control of third parties. Defendant further objects to this Request on the grounds that it is duplicative of the Request.

**Response No. 13:**

All documents and communications concerning every edition of every educational product sold, distributed, or displayed by or at <FFLTrust.com>.

**REQUEST NO. 13**

Subject to and without waiving the foregoing General and Specific Objectives, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within its actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

Defendant, but rather are in the possession, custody, and control of Counterdefendants, or of third parties, including but not limited to the Bureau of Alcohol, Tobacco, Firearms and Explosives. Defendant further specifically objects to this Request on the grounds that it is overly broad, unduly burdensome, and seeks information or documents that are neither specific requests, and refer Counterdefendants to those documents to be produced in response to those requests. Further objects to this Request on the grounds that it is duplicative of the Request. Defendant further objects to any party's claim or defense nor proportional to the needs of the case. Defendant relevant to any party's claim or defense nor proportional to the needs of the case. Defendant objects to this Request on the grounds that it is duplicative of the Request, more specifically objects to this Request on the grounds that it is unduly burdensome, and seeks information or documents that are neither to those requests.

All documents and communications You have sent or have caused to be sent out from any email account or online service provider to multiple third-parties at once or in rapid succession concerning federal firearms licensing in the United States, including documents and communications sufficient to identify each recipient of any such newsletter, list serve, or email blast and describe how recipients were able to opt-into receiving such communications or otherwise became designated as a recipient of the same.

**Response No. 14:**

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of third parties. Defendant specifically objects to this Request to the extent that it seeks documents protected from discovery under the attorney-client privilege, attorney work product doctrine, or any other applicable privilege or protection. Defendant further specifically objects to this Request on the grounds that it is wholly overly broad, vague and ambiguous as to the phrase “online service provider,” ambiguous as to the meaning of “opt-into,” ambiguous as to the meaning of “in rapid succession” in the context of this Request, unduly burdensome, and seeks information or documents that are neither relevant to any party’s claim or defense nor proportional to the needs of the case. Defendant further objects to this Request to the extent it directs Defendant to “describe” anything. Defendant further objects to this Request on the grounds that it is duplicative of subsequent and prior requests.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within its actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

**REQUEST NO. 15**

Documents sufficient to show the nature and quality of Defendant Platinum’s services.

**Response No. 15:**

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of other Defendants. Defendant further specifically objects to this Request on the grounds that it is wholly overly broad, vague as to the meaning of “quality,” unduly burdensome, and seeks information or documents that are neither relevant to any party’s claim or defense nor proportional to the needs of the case.

Subject to and without waiving the foregoing General and Specific Objectives, and located after a reasonable and diligent search that are responsive to this Request. Any non-privileged documents within its actual possession, custody or control that can be subject to a stipulated confidentiality agreement and protective order, Defendant will produce

unduly burdensome, seeks confidential or proprietary information. Defendant further objects to this Request on the grounds that it is premature, overly broad, Defendant, but rather are in the possession, custody, and control of Counterdefendants. Production of documents that are not in the actual possession, custody, or control of Defendant specifically objects to this Request on the grounds that it seeks the

#### Response No. 17:

All documents and communications concerning any damages You claim to have suffered in this action.

#### REQUEST NO. 17

located after a reasonable and diligent search that are responsive to this Request. Any non-privileged documents within its actual possession, custody or control that can be subject to a stipulated confidentiality agreement and protective order, Defendant will produce

subject to and without waiving the foregoing General and Specific Objectives, and grounds that it is duplicative of subsequent and prior requests. Defendant further objects to this Request on the grounds that it is wholly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor to the meaning of "employee" in the context of this Request, unduly burdensome, and specifically objects to this Request that it is wholly overly broad, ambiguous product doctrine, or any other applicable privilege or protection. Defendant further documents protected from attorney-client privilege, attorney work third parties. Defendant specifically objects to this Request to the extent that it seeks production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of other Defendants or of

Defendant specifically objects to this Request on the grounds that it seeks the production of documents concerning every third party employed by You, Defendant Osko, or Defendant Platinum in connection with <FFLTrust.com>. All documents and communications concerning every third party employed by You,

#### REQUEST NO. 16

**REQUEST NO. 18**

All documents and communications concerning Defendant Platinum's role in the creation, maintenance, administration, or management of <FFLTrust.com>.

**Response No. 18:**

Defendant specifically objects to this Request to the extent that it seeks documents protected from discovery under the attorney-client privilege, attorney work product doctrine, or any other applicable privilege or protection. Defendant further specifically objects to this Request on the grounds that it is wholly overly broad, ambiguous as to the meaning of "role" in the context of this Request, unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. Defendant further objects to this Request on the grounds that it is duplicative of subsequent and prior requests.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within its actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

**REQUEST NO. 19**

All documents and communications concerning the creation, acquisition, or inclusion of any federal firearms license that appears or has appeared in any materials sold, distributed, or displayed by or at <FFLTrust.com>.

**Response No. 19:**

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of third parties. Defendant specifically objects to this Request to the extent that it seeks documents protected from discovery under the attorney-client privilege, attorney work product doctrine, or any other applicable privilege or protection. Defendant further specifically objects to this Request on the grounds that it is wholly overly broad, vague and ambiguous as to the phrase "the creation, acquisition, or inclusion of" in the context of this Request, unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. Defendant further objects to this Request on the grounds that it is duplicative of subsequent and prior requests.

Subject to and without waiving the foregoing General and Specific Objections, and

located after a reasonable and diligent search that are responsive to this Request.  
any non-privileged documents within its actual possession, custody or control that can be  
subject to a stipulated confidentiality agreement and protective order, Defendant will produce  
subject to and without waiving the foregoing General and Specific Objects, and

Defendant further objects to this Request on the grounds that it is premature, overly broad,  
Defendant, but rather are in the possession, custody, and control of Counterdefendants.  
Production of documents that are not in the actual possession, custody, or control of  
Defendant specifically objects to this Request on the grounds that it seeks the  
and unduly burdensome.

**Response No. 21:**

All documents and communications concerning Alexey Bubily as referenced in Your  
Counterclaims.

**REQUEST NO. 21**

located after a reasonable and diligent search that are responsive to this Request.  
any non-privileged documents within its actual possession, custody or control that can be  
subject to a stipulated confidentiality agreement and protective order, Defendant will produce  
subject to and without waiving the foregoing General and Specific Objects, and

Defendant further objects to this Request on the grounds that it is premature, overly broad,  
Defendant, but rather are in the possession, custody, and control of Counterdefendants.  
Production of documents that are not in the actual possession, custody, or control of  
Defendant specifically objects to this Request on the grounds that it seeks the  
and unduly burdensome.

**Response No. 20:**

All documents and communications concerning Rabiu Islam as referenced in Your  
Counterclaims.

**REQUEST NO. 20**

located after a reasonable and diligent search that are responsive to this Request.  
any non-privileged documents within its actual possession, custody or control that can be  
subject to a stipulated confidentiality agreement and protective order, Defendant will produce  
subject to and without waiving the foregoing General and Specific Objects, and

**REQUEST NO. 22**

Documents and communications sufficient to identify every domain that You own, control, manage, or administer.

**Response No. 22:**

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of third parties. Defendant further specifically objects to this Request on the grounds that it is wholly overly broad (other domains are not at issue in this case), unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. Defendant further objects to this Request on the grounds that it is duplicative of subsequent and prior requests.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within its actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

**REQUEST NO. 23**

All documents and communications upon which You intend to rely to support Your assertion that any statement made by BMaddox or Brandon Maddox was likely to deceive consumers as to Platinum's services.

**Response No. 23:**

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of Counterdefendants or of third parties. Defendant further specifically objects to this Request on the grounds that it is wholly overly broad, unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. This Request also calls for a legal conclusion, and Defendant is not obligated to provide legal analysis in its discovery responses.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within its actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

Subject to and without waiving the foregoing General and Specific Objects, and  
any non-privileged documents within its actual possession, custody or control that can be  
subject to a stipulated confidentiality agreement and protective order, Defendant will produce  
located after a reasonable and diligent search that are responsive to this Request.

Defendant specifically objects to this Request on the grounds that it seeks the  
product of documents that are not in the actual possession, custody, or control of  
Defendant, but rather are in the possession, custody, and control of Counterdefendants or of  
third parties. Defendant further specifically objects to this Request on the grounds that it is  
wholly overly broad, unduly burdensome, and seeks information or documents that are  
neither relevant to any party's claim or defense nor proportional to the needs of the case. This  
Request also calls for a legal conclusion, and Defendant is not obligated to provide legal  
analysis in its discovery responses.

All documents and communications upon which You intend to rely to support Your assertion  
that BMaddox or Brandon Maddox engaged in a pattern of unfair competition.  
Response No. 25:

## REQUEST NO. 25

Subject to and without waiving the foregoing General and Specific Objects, and  
any non-privileged documents within its actual possession, custody or control that can be  
subject to a stipulated confidentiality agreement and protective order, Defendant will produce  
located after a reasonable and diligent search that are responsive to this Request.

Defendant specifically objects to this Request on the grounds that it seeks the  
product of documents that are not in the actual possession, custody, or control of  
Defendant, but rather are in the possession, custody, and control of Counterdefendants or of  
third parties. Defendant further specifically objects to this Request on the grounds that it is  
wholly overly broad, unduly burdensome, and seeks information or documents that are  
neither relevant to any party's claim or defense nor proportional to the needs of the case. This  
Request also calls for a legal conclusion, and Defendant is not obligated to provide legal  
analysis in its discovery responses.

All documents and communications upon which You intend to rely to support Your assertion  
that Platinum's reputation has been irreparably harmed.

## REQUEST NO. 24

**REQUEST NO. 26**

All documents and communications upon which You intend to rely to support Your assertion that You are entitled to punitive damages under any claim You have asserted.

**Response No. 26:**

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of Counterdefendants. Defendant further specifically objects to this Request to the extent that it seeks documents protected from discovery under the attorney-client privilege, attorney work product doctrine, or any other applicable privilege or protection. Defendant further specifically objects to this Request on the grounds that it is wholly overly broad, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. This Request also calls for a legal conclusion, and Defendant is not obligated to provide legal analysis in its discovery responses.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within its actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

**REQUEST NO. 27**

All documents and communications upon which You intend to rely to support Your assertion that either BMaddox or Brandon Maddox knew of any claimed contracts Platinum had entered into with third parties.

**Response No. 27:**

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of Counterdefendants or of third parties. Defendant further specifically objects to this Request on the grounds that it is premature, wholly overly broad, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. This Request also calls for a legal conclusion, and Defendant is not obligated to provide legal analysis in its discovery responses.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of Counterdefendants or of third parties. Defendant further specifically objects to this Request on the grounds that it is neither relevant nor properly intended to the meaning of the phrase "intending to damage," unduly burdensome, and seeks information or documents that are neither relevant wholly overly broad, vague and ambiguous as to the meaning of the phrase "intending to damage," unduly burdensome, and seeks information or documents that are neither relevant to the actual possession, custody, or control of Counterdefendants or of third parties. Defendant further objects to this Request on the grounds that it is

**Response No. 29:**

All documents and communications upon which You intend to rely to support Your assertion that BMaddox or Brandon Maddox intentionally and improperly interfered with any contracts between You and any third party intending to damage business.

**REQUEST NO. 29**

Subject to and without waiving the foregoing General and Specific Objects, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within its actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

Request on the grounds that it is duplicative of Request No. 10 directed to Defendant Milad Skouie. Defendant nor proportional to the needs of the case. Defendant further objects to this claim or defense nor proportional to the needs of the case. Defendant further objects to this Request on the grounds that it is unduly burdensome, and seeks information or documents that are neither relevant to any party's <FFLTrust.com> are not at issue), vague as to the meaning of "hosting providers," unduly burdensome, and seeks information or documents that are neither relevant to any party's other applicable privilege or protection. Defendant further specifically objects to this

further specifically objects to this Request to the extent that it seeks documents protected from discovery under the attorney-client privilege, attorney work product doctrine, or any other privilege or protection. Defendant further objects to this Request on the grounds that it is premature, overly broad (websites other than

Defendant, but rather are in the possession, custody, and control of third parties. Defendant production of documents that are not in the actual possession, custody, or control of

All contracts or agreements between You and Your hosting providers during the past four (4) years.

**REQUEST NO. 28**

located after a reasonable and diligent search that are responsive to this Request.

to any party's claim or defense nor proportional to the needs of the case. This Request also calls for a legal conclusion, and Defendant is not obligated to provide legal analysis in its discovery responses.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within its actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

**REQUEST NO. 30**

Documents and things sufficient to identify every computer, tablet, cellular phone, notebook, laptop, or other computing device that You have owned, leased, or regularly used, at work or otherwise, during the past four (4) years.

**Response No. 30:**

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of third parties. Defendant further specifically objects to this Request to the extent that it seeks documents protected from discovery under the attorney-client privilege, attorney work product doctrine, or any other applicable privilege or protection. Defendant further specifically objects to this Request on the grounds that it is overly broad, vague as to the meaning of "regularly used," unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case.

**REQUEST NO. 31**

All documents and communications concerning any claim You have made to own any rights protected by copyright in connection with <infiniteconversions.com>, <TheUnitutor.com>, <FFLTrust.com>, or any other content during the past four (4) years.

**Response No. 31:**

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of third parties. Defendant further specifically objects to this Request on the grounds that it is wholly overly broad (other websites are not at issue), vague and ambiguous as to the meaning of the phrase "any claim You have made to own any rights protected by copyright," unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor

Request also calls for a legal conclusion, and Defendant is not obligated to provide legal neither relevant to any party's claim or defense nor proportional to the needs of the case. This "suppressed competition," unduly burdensome, and seeks information or documents that are premature, wholly overly broad, vague and ambiguous as to the meaning of the phrase Defendant further specifically objects to this Request on the grounds that it is third parties. Defendant, but rather are in the possession, custody, and control of Counterdefendants or of Defendant, but rather are in the actual possession, custody, or control of production of documents that are not in the actual possession, custody, or control of Defendant specifically objects to this Request on the grounds that it seeks the

**Response No. 33:**

All documents and communications upon which You intend to rely to support Your assertion that BMaddox or Brandon Maddox registered <MiladOskouie.com> with a bad faith, specific intent to profit from said registration.

**REQUEST NO. 33**

Subject to and without waiving the foregoing General and Specific Objects, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within its actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

Request also calls for a legal conclusion, and Defendant is not obligated to provide legal neither relevant to any party's claim or defense nor proportional to the needs of the case. This "unlawfully monopolized," unduly burdensome, and seeks information or documents that are premature, wholly overly broad, vague and ambiguous as to the meaning of the phrase Defendant, but rather are in the actual possession, custody, and control of Counterdefendants or of Defendant, but rather are in the actual possession, custody, or control of production of documents that are not in the actual possession, custody, or control of Defendant specifically objects to this Request on the grounds that it seeks the

**Response No. 32:**

All documents and communications upon which You intend to rely to support Your assertion that BMaddox has unlawfully monopolized in the "FFL guide market" or the "online FFL guide supermarket."

**REQUEST NO. 32**

Defendant is not obligated to provide legal analysis in its discovery responses. proportional to the needs of the case. This Request also calls for a legal conclusion, and

analysis in its discovery responses.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within its actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

**REQUEST NO. 34**

All documents and communications upon which You intend to rely to support Your claim that BMaddox or Brandon Maddox intentionally interfered with any property or chattel owned by Platinum and that any such alleged interference damaged Platinum.

**Response No. 34:**

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of Counterdefendants or of third parties. Defendant further specifically objects to this Request on the grounds that it is premature, overly broad, unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. This Request also calls for a legal conclusion, and Defendant is not obligated to provide legal analysis in its discovery responses.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within its actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

**REQUEST NO. 35**

All documents and communications upon which You intend to rely to support Your assertion that You are entitled to an award of attorneys' fees under any claim You have asserted.

**Response No. 35:**

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of Counterdefendants. Defendant further specifically objects to this Request to the extent that it seeks documents protected from discovery under the attorney-client privilege, attorney work product doctrine, or any other applicable privilege or protection. Defendant further specifically objects to this



Milad Oskouie

are true and correct to the best of my knowledge, information and belief.

DEFENDANT PLATINUM AVENUE HOLDINGS PTY, LTD  
REQUESTS FOR THE PRODUCTION OF DOCUMENTS AND THINGS TO  
AND OBJECTIONS TO PLAINTIFF AND COUNTCLAIM DEFENDANTS. FIRST  
foregoing DEFENDANT PLATINUM AVENUE HOLDINGS PTY, LTD'S RESPONSES  
VERIFICATION I hereby declare under penalty of perjury that the facts stated in the  
REQUISITIONS TO PLAINTIFF AND COUNTCLAIM DEFENDANTS. FIRST  
AND OBJECTIONS TO PLAINTIFF AND COUNTCLAIM DEFENDANTS. FIRST  
DEFENDANT PLATINUM AVENUE HOLDINGS PTY, LTD

Milad Oskouie



Dated: Tehran, Iran  
October 18<sup>th</sup>, 2019

Subject to and without waiving the foregoing General and Specific Objectives, and  
subject to a stipulated confidentiality agreement and protective order, Defendant will produce  
any non-privileged documents within its actual possession, custody or control that can be  
located after a reasonable and diligent search that are responsive to this Request.  
Legal analysis in its discovery responses.

Request on the grounds that it is wholly overly broad, and seeks information or documents  
that are neither relevant to any party's claim or defense nor proportional to the needs of the  
case. This Request also calls for a legal conclusion, and Defendant is not obligated to provide  
legal analysis in its discovery responses.

**Certificate of Service**

I hereby certify that a true and correct copy of the foregoing document:

**DEFENDANT PLATINUM AVENUE HOLDINGS PTY, LTD'S RESPONSES AND  
OBJECTIONS TO PLAINTIFF AND COUNTERCLAIM DEFENDANTS' FIRST  
REQUESTS FOR THE PRODUCTION OF DOCUMENTS AND THINGS TO  
DEFENDANT PLATINUM AVENUE HOLDINGS PTY, LTD**

has been served via email on:

Anderson J. Duff, Esq.  
Revision Legal, PLLC  
244 5th Avenue, Suite 2230  
New York, NY 10001  
Phone: 212.996.4103  
E-mail: [anderson@revisionlegal.com](mailto:anderson@revisionlegal.com) and [ajd@revisionlegal.com](mailto:ajd@revisionlegal.com)

this 18<sup>th</sup> day of October 2019



*Milad Oskouie*



**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

BMADDOX ENTERPRISES LLC,

Plaintiff,

v.

MILAD OSKOUIE, OSKO M LTD, and  
PLATINUM AVENUE HOLDINGS  
PTY, LTD,

Defendants.

MILAD OSKOUIE and PLATINUM  
AVENUE HOLDINGS PTY, LTD,

Counterclaimants,

v.

BMADDOX ENTERPRISES LLC and  
BRANDON MADDOX,

Counterdefendants.

Case No.: 1:17-cv-01889-RA-HBP

**DEFENDANT PLATINUM AVENUE  
HOLDINGS PTY, LTD'S RESPONSES  
AND OBJECTIONS TO PLAINTIFF  
AND COUNTERCLAIM DEFENDANTS'  
FIRST SET OF INTERROGATORIES  
TO DEFENDANT AND  
COUNTERCLAIM PLATINUM  
AVENUE HOLDINGS PTY, LTD**

Pursuant to Federal Rules of Civil Procedure 26 and 33 Defendant Platinum Avenue Holdings Pty, Ltd (“Defendant” or “Platinum”) hereby responds and objects to Plaintiff and Counterclaim Defendants’ First Set of Interrogatories to Defendant and Counterclaim Plaintiff Platinum Avenue Holdings Pty, Ltd. (“Interrogatory(ies)”) as set forth below. Defendant’s discovery efforts are continuing and they reserve the right to amend or supplement these responses and objections as necessary.

needs of the case.

that are not likely to lead to the discovery of admissible evidence nor proportional to the specify a time period relevant to the issues raised in this matter, such that seek documents

7. Defendant objects to Plaintiff's Interrogatories on the grounds that they do not

and purports to include persons or entities that are not Defendant.

6. Defendant objects to the definition of "Defendant" to the extent it is overbroad

nature.

5. Defendant objects to each interrogatory to the extent that it is premature in

different interpretations in different contexts.

ambiguous, unduly burdensome, not sufficiently limited in scope, undefined and subject to

4. Defendant objects to each interrogatory to the extent it is overbroad, vague,

orders entered in this matter.

Rules of United States District Court for the Southern District of New York, as well as any

obligations beyond those required by the Federal Rules of Civil Procedure and the Local

3. Defendant objects to each interrogatory to the extent it purports to impose

proportional to the needs of the case.

information not reasonably calculated to lead to the discovery of admissible evidence nor

2. Defendant objects to each interrogatory to the extent it calls for irrelevant

proprietary information.

attorney-client communications, protected work product, trade secrets or confidential and/or

1. Defendant objects to each interrogatory to the extent it seeks privileged

## GENERAL QUALIFICATIONS AND OBJECTIONS

8. Defendant's responses herein are expressly subject to each of the foregoing "General Objections" and each of them are expressly incorporated by reference into each response.

9. Defendants reserve the right to supplement their responses to Plaintiff's Interrogatories as more information becomes known.

10. Each of the foregoing General Objections is incorporated within each of the responses set forth herein.

11. Defendant objects to Instruction No. 2 to the extent that it attempts to impose duties contrary to or inconsistent with the Federal Rules.

Subject to and without waiving such General Objections, Defendant responds as follows:

#### **INTERROGATORY NO. 1**

Identify each person who participated in, assisted with, or provided any information used in the preparation of the website appearing at <ffltrust.com>.

#### **Response No. 1:**

Defendant specifically objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. Defendant further objects to this Interrogatory under Local Rule 33.3(b) because request for production of documents and/or depositions are more practical methods of obtaining the information sought. In this respect, Defendant anticipates that it will produce documents that will contain the information requested to the extent that Counterdefendants requested such documents via its document requests and to the extent such documents exist in Defendant's possession, custody and control. Further, upon request and within the limits of Fed. R. Civ. P. 30 and other applicable rules and orders, Defendant will make one or more witnesses available to provide responsive deposition testimony.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant also refers

Defendant specifically objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome, and seeks information or documents that are neither relevant to any party's claim nor proportional to the needs of the case. Defendant further objects to this Interrogatory under Local Rule 33.3(b) because request for production of documents and/or depositions are more practical methods of obtaining the information sought by this Interrogatory.

**Response No. 3:**

Identify each person who has personal knowledge concerning the management administration, finances, financial record keeping, cash flow, or the manner in which Plaintiff processed any money or benefit arising out of its businesses, including but not limited to <FFLTrust.com>, <InfiniteConversions.com>, and <TheUnitutor.com> during the past four (4) years.

**INTERROGATORY NO. 3**

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant also refers Counterdefendants to Defendants' initial disclosures.

In this respect, Defendant anticipates that it will produce documents that will contain the information requested to the extent that Counterdefendants requested such documents via its document requests and to the extent such documents exist in Defendant's possession, custody and control. Further, upon request and within the limits of Fed. R. Civ. P. 30 and other applicable rules and orders, Defendant will make one or more witnesses available to provide responsive deposition testimony.

Its document requests and to the extent such documents exist in Defendant's possession, custody and control, upon request and within the limits of Fed. R. Civ. P. 30 and other applicable rules and orders, Defendant will make one or more witnesses available to provide responsive deposition testimony.

**Response No. 2:**

Identify each person who has personal knowledge concerning the subject matter of this litigation including but not limited to the allegations set forth in the Complaint and the Counterclaims.

**INTERROGATORY NO. 2**

Counterdefendants to Defendants' initial disclosures.

sought. In this respect, Defendant anticipates that it will produce documents that will contain the information requested to the extent that Counterdefendants requested such documents via its document requests and to the extent such documents exist in Defendant's possession, custody and control. Further, upon request and within the limits of Fed. R. Civ. P. 30 and other applicable rules and orders, Defendant will make one or more witnesses available to provide responsive deposition testimony.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant also refers Counterdefendants to Defendants' initial disclosures.

#### **INTERROGATORY NO. 4**

Identify each internet service provider, cell phone provider, virtual private network service provider, electronic communication service, and remote computing service that provided any service to You concerning the operation of <FFLTrust.com>, <TheUnitutor.com>, or <InfiniteConversions.com> as well as each agreement, whether written or otherwise made, between any such service provider and Yourself.

#### **Response No. 4:**

Defendant specifically objects to this s Interrogatory on the grounds that it is overly broad, unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. Defendant further objects to this Interrogatory under Local Rule 33.3(b) because request for production of documents and/or depositions are more practical methods of obtaining the information sought. In this respect, Defendant anticipates that it will produce documents that will contain the information requested to the extent that Counterdefendants requested such documents via its document requests and to the extent such documents exist in Defendant's possession, custody and control. Further, upon request and within the limits of Fed. R. Civ. P. 30 and other applicable rules and orders, Defendant will make one or more witnesses available to provide responsive deposition testimony.

#### **INTERROGATORY NO. 5**

Identify each resource upon to create the content that has appeared on <FFLTrust.com> at any point in time.

#### **Response No. 5:**

Defendant specifically objects to this s Interrogatory on the grounds that it is overly broad, vague as to the phrase "upon to create," unduly burdensome, and seeks information or

Milad Oskouie



Dated: Tehran, Iran  
October 18<sup>th</sup>, 2019

Defendant specifically objects to this s Interrogatory on the grounds that it is overly broad, unduly burdensome, and seeks information or documents that are neither relevant to any party's claim nor proportional to the needs of the case. Defendant also objects to this interrogatory as in violation of Local Rule 33.3(a). Defendant further objects to this interrogatory under Local Rule 33.3(b) because request for production of documents and/or depositions are more practical methods of obtaining the information sought.

**Response No. 7:**

Identify every office You have maintained or currently maintain.

**INTERROGATORY NO. 7**

Defendant specifically objects to this s Interrogatory on the grounds that it is overly broad, unduly burdensome, and seeks information or documents that are neither relevant to any party's claim nor proportional to the needs of the case. Defendant also objects to this interrogatory as in violation of Local Rule 33.3(a). Defendant further objects to this interrogatory under Local Rule 33.3(b) because request for production of documents and/or depositions are more practical methods of obtaining the information sought.

**Response No. 6:**

Identify every computer, tablet, cellular phone, notebook, laptop, or other computing device that You have owned, leased, or regularly used, at work or otherwise, during the past four (4) years.

**INTERROGATORY NO. 6**

Documents that are neither relevant to any party's claim nor proportional to the needs of the case. Defendant also objects to this s Interrogatory as in violation of Local Rule 33.3(a). Defendant further objects to this s Interrogatory under Local Rule 33.3(b) because request for production of documents and/or depositions are more practical methods of obtaining the information sought.

VERIFICATION I hereby declare under penalty of perjury that the facts stated in the foregoing **DEFENDANT PLATINUM AVENUE HOLDINGS PTY, LTD'S RESPONSES AND OBJECTIONS TO PLAINTIFF AND COUNTERCLAIM DEFENDANTS' FIRST SET OF INTERROGATORIES TO DEFENDANT AND COUNTERCLAIM PLAINTIFF PLATINUM AVENUE HOLDINGS PTY, LTD** are true and correct to the best of my knowledge, information and belief.

Milad Oskouie

A handwritten signature in black ink, appearing to read "MO".

*Millard Oskouie*



this 18<sup>th</sup> Day of October 2019

Anderson J. Duff, Esq.  
Revision Legal, PLLC  
244 5th Avenue, Suite 2230  
New York, NY 10001  
Phone: 212.996.4103  
E-mail: anderson@revisionlegal.com and ajd@revisionlegal.com

has been served via email on:

DEFENDANT PLATINUM AVENUE HOLDINGS PTY, LTD  
OBJECTIONS TO PLAINTIFF AND COUNTERCLAIM DEFENDANTS' FIRST  
SET OF INTERROGATORIES TO DEFENDANT AND COUNTERCLAIM  
PLAINTIFF PLATINUM AVENUE HOLDINGS PTY, LTD

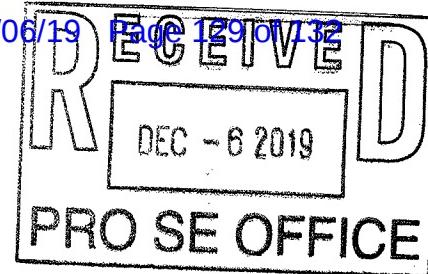
I hereby certify that a true and correct copy of the foregoing document:

*Certificate of Service*

30 November 2019

Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

ROOM 200  
PRO SE OFFICE



**Re: BMaddox Enterprises LLC v. Milad Oskouie, Osko M Ltd., and Platinum Avenue Holdings Pty, Ltd.**

Dear Judge Cave,

I am writing in response to Mr Duff's letter motion to leave dated 22 October 2019 (ECF No. 180).

The arguments made by Plaintiff's counsel are without substance, misconceived and are lacking in credibility.

My response will unfortunately but necessarily be lengthy given the myriad of claims made by Mr Duff.

At the outset, I will address one specific false allegation made by Mr Duff in his latest letter alleging that I have harassed "Plaintiff's undersigned counsel and his family in several malicious ways". I deny this claim, in addition to his other claims. Plaintiff's counsel provides no evidence of my involvement in any of these matters apart from mere speculation and conjecture. It does, however, appear to be a tactic used by him to increase his billable hours. The credibility of his claim is further diminished by the fact that Mr Duff's own mother has denied, while speaking to a process server, that she has had any contact with Mr Duff for several years. Mr Duff was recently sued by Barclays Bank Delaware for unpaid debts of \$7349.45 (BARCLAYS BANK DELAWARE Vs. ANDERSON J DUFF 19-000900-CO | Florida State, Pinellas County, County Court)(**Ex A**). A process server was unable to serve Mr Duff and lead to the case being dismissed. The process server attempting to serve Mr Duff said that "*Cindy Duff, RESIDENT...stated defendant is her son and no longer resides here. Stated they lost touch and had no knowledge of his current whereabouts...*" (**Ex B**). Therefore, it is clear his claim about his family being harassed is untrue. Even more concerning is that he was also once charged with a felony for attempted burglary of a school (ECF 132).

The Plaintiff's client—whom happens to hold a license to use and sell "military grade weapons"—continues to harass my family, my doctor's family, and my doctor's fourteen year old daughter, via blatant threats of violence to cryptic threats involving travel restrictions: ECF 139-A and ECF 139-B. In ECF 130-2 Mr Maddox indicates he has had access to my bank account and my mothers. In ECF 130-C, Mr Maddox makes use of his international network of organized cyber criminals to take down the website the subject of this lawsuit. He further demonstrates his complete disregard for the judicial process when he states "Attorney maybe expensive and time consuming" to one of the hackers and suggests that hacking is more effective than taking any action via the legal system. Maddox asked the hacker named "Rabiul Islam" if it is "[p]ossible to hire you to focus efforts on getting ffltrust.com removed?". Rabiul Islam replied, "Shall I take down the site [FFLTrust.com] or only help your attorney to file the case?" In addition, Mr Maddox and Rabiul Islam decide to plant and concoct 'evidence' in my site and frame me: "...I can put together the evidence for your...However, it might will take more time to do that..." Mr Maddox is precisely guilty of the very thing he accuses me of. He has resorted to the use of a criminal hacker to help him "...put together evidence" and "help your attorney file the case". In ECF 56 at page 23, Mr Duff concedes to the accuracy of these screenshots and describes his client's actions to break the law by hacking his competitor as "...exploring his options..."

A Supreme Court Judge in Australia has described the Plaintiff as "high-handed", "wholly arrogant" and "everyone's worst nightmare"(ECF 174), though the learned Mr Duff dismisses the entirety of that judgement—despite Judge Rothman specifically mentioning that the judgement is valid under South Dakota law (Paragraph 74-75 *Oskouie v*

Maddox [2019] NSWC 428 (18 April 2019)—in a few words and erroneously claims that the United States' interpretation of the Hague Convention does not permit service via any means apart from the Central Judicial Authority. Mr Duff would be better advised if he read Article 10 of the Hague Convention on the Service Abroad of Judicial and Extra-judicial Documents in Civil or Commercial Matters, which the USA has not opposed nor the state of South Dakota. Mr Duff seems to have misread the law and overlooked an important factor for his client. He has misread the term “provides” in “The Hague Convention provides for service via a central authority in the receiving nation, which in the United States is the Department of Justice.” (emphasis added) to imply that service via central authority is the only valid means of service in the USA.

In ECF 153 at paragraph 4, he also acknowledges further documents were produced. In addition, in ECF 154 at paragraph 2, Mr Duff acknowledges that he has received 426 pages of discovery materials. In ECF 154 previous counsef's objections to his requests were raised as early as December 2017. Instead of even considering my then lawyer.

In ECF 148, Magistrate Pitman refers to the conference on 2 May 2018. He stated that Defendants' Counsel failed to appear at this hearing. It is clear from ECF 155 that my then attorney Saul Rooffe was unaware of this conference and hence Magistrate Pitman's decision was made in absence of any representation on my behalf. The 30 September 2019 order made without any representation on my side due to an administrative oversight by misrepresentation of my position is disturbing. The responses I sent to Mr Duff are Ex C, Ex D, Ex E, Ex F, Ex G, Ex H. I have made all my best efforts to respond to Plaintiff's requests. I have raised objections to his requests. Plaintiff's

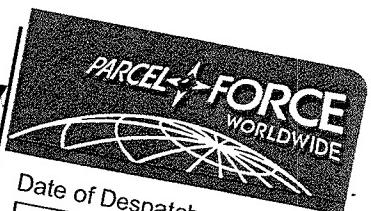
Defendants respectfully request that Plaintiff's Letter Motion be denied.

Milad Oskouie  
  
Milad Oskouie  
Tehran, Iran  
30 November 2019

DANIEL PATRICK MOYNIHAN  
ROOM 200  
PRO SE OFFICE  
UNITED STATES COURTHOUSE  
500 PEARL ST.  
NEW YORK  
NY 10007-1312



globalpriority



EE 593 713 447 GB  
CN23

Date of Despatch

EE 593 713 447 GB



EE 593 713 447 GB

LIFT

PFU511

Recipient  
phone no.

EMS



